

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nile Arena  
400 W Wilson St  
Bloomington, Indiana 47403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrea Steig  
5750 36th Ave NE  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sara Hale  
1045 N.WestEnd Blvd. Lot 250, 3 Ash Lane  
Quakertown, Pennsylvania 18951

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James R Monroe  
5521 Michigan Blvd  
Concord, California 94521

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bruce Lowrey  
911 Drumm Cir  
Independence, Missouri 64055

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Harper  
13535 Agua Dulce  
Castroville, California 95012

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Catherine Saint-Clair  
5669 SE Ault Ave  
Stuart, Florida 34997

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Phillips  
1109 Rear Main  
Boonville, Missouri 65233



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Evelyn Griffin  
P.O. Box 21  
Pavillion, Wyoming 82523

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristin Rosenqvist  
Robb Drive  
Reno, Nevada 89523

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joanne Kondratieff  
20 Milstead Cir  
Shawnee, Oklahoma 74801

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Milton and Shirley Nelson  
1451 Spruce St  
Florence, Oregon 97439

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Evelyn McMullen  
Montgomery, Alabama 36109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Sheehy  
4727 Alpine Dr  
Klamath Falls, Oregon 97603

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jonsey Malone  
1200 E Wrangler Blvd  
Seminole, Oklahoma 74868

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Peel  
14044 Shimmering Lake Ct  
Fort Myers, Florida 33907



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John&Shirley Valney  
295 Hillcrest Dr  
Reno, Nevada 89509

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donald Leisman  
523 N Pembroke Rd  
Suncook, New Hampshire 3275

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Christopher Dowling  
PO Box 1753  
Marfa, Texas 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Klueger  
W2274 County Road Y  
Lomira, Wisconsin 53048

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Sawyer  
1621 Posilipo Ln  
Santa Barbara, California 93108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leo Shapiro  
6907 Rhode Island Ave  
College Park, Maryland 20740

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Terry Tedesco-Kerrick  
3042 E Squaw Peak Cir  
Phoenix, Arizona 85016

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Sileno  
1509 W Cornwallis Dr  
Greensboro, North Carolina 27408



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Rankin rankin  
5721 SW Nebraska St  
Portland, Oregon 97221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lillian Nordin  
N8851 Wm. Severson Rd.  
Holmen, Wisconsin 54636

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

A Rosenthal  
9109 24th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dudley And Candace Campbell  
13167 Ortleby Pl  
VAN NUYS, California 91401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

lisa allarde  
128 Bernies Dr  
Kunkletown, Pennsylvania 18058

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrew Jackson  
14131 Bishop Bend Ln  
Houston, Texas 77047

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shelley McDonough  
302 Greenwood Ave  
Greencastle, Indiana 46135

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virginia Feldman  
11230 SW Collina Ave  
Portland, Oregon 97219



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Palla  
45 N Carlisle St  
Greencastle, Pennsylvania 17225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Scott  
15930 Bayside Pointe W  
Fort Myers, Florida 33908

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ray C. Telfair II, Ph.D.  
1780 S. Hill Creek Road  
Progreso, Texas 78579

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Priscilla Martine  
5308 La Colonia Dr NW  
Albuquerque, New Mexico 87120

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teresa Mcfarland  
10740 SW 11th Dr  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helene Rosen9  
92 Grandview Dr  
Warminster, Pennsylvania 18974

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

A.L. Steiner  
1299 Cornwallville Rd  
Cornwallville, New York 12418

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Verbeck  
200 W 28th St  
Vancouver, Washington 98660



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Grant  
211 Stanford Ave  
Medford, Oregon 97504

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan Monical  
55854 Hazen Rd  
Warren, Oregon 97053

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Edwards  
291 Limerick Ave  
Eugene, Oregon 97404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cynthia Hicks  
1652 W Campbell Ave  
Phoenix, Arizona 85015

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gini Heersma-Covert  
18194 Doyle Rd  
Blue rivet

Blue River, Wisconsin 53518

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Russ Beebe  
1220 Tasman Dr  
Sunnyvale, California 94089

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Sylv  
Hansen, Idaho 83334



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joan Agro  
496 Western Hwy  
Blauvelt, New York 10913

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Wyman  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Bender  
38755 Beulah Reed Rd  
Nehalem, Oregon 97131

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephen Josephson  
Po Box2000  
Berkeley, California 94702

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Post  
4870 Skyline Dr  
Shawnee Mission, Kansas 66205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

E. P.  
PO Box 178  
Talmage, California 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susanne Hesse & Doug Dyer  
29003 NW 182nd Ter  
Alachua, Florida 32615

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

A.C. MCGARRY  
11510 Beckley Rd  
Belleville, Michigan 48111



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lacey Hicks  
34655 Skylark Dr  
Union City, California 94587

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Louise Rangel  
Santa Paula, California 93060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephen Dutschke  
4306 Darbrook Rd  
Louisville, Kentucky 40207

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bob Thomas  
2001 Weaver Rd  
Myrtle Creek, Oregon 97457

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ron Hubert  
6800 Virgil Way  
Flagstaff, Arizona 86001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Vivas  
6902 SE Riverside Dr  
Vancouver, Washington 98664

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

les roberts  
PO Box 199  
Serafina, New Mexico 87569

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Debbie Thomas  
P.O. Box 2377  
Fernley, Nevada 89408



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan and Larry Slobin  
1481 NW 13th Ave  
Portland, Oregon 97209

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Abaunza  
262 S Main St  
Lodi, New Jersey 7644

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Juanita Dawson-Rhodes  
210 Ridgefield Ave  
South Salem, New York 10590

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Val Sanfilippo  
3246 Ashford St  
San Diego, California 92111

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

karen Langelier  
3613 St Johns Ct  
Wilmington, North Carolina 28403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kay Reinfried  
797 Scott Ln  
Lititz, Pennsylvania 17543

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Benton Elliott  
1313 Lincoln St  
Eugene, Oregon 97401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

CJ James  
Box 7  
Eugene, Oregon 97440



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Mullen  
Saint Charles, Minnesota 55972

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kenneth Bierman  
4255 N Limberlost Ci  
Tucson, Arizona 85705

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Bakeer  
1040 Kearney St  
Denver, Colorado 80220

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Bumgarner  
309 Pacific Ave  
Osawatomie, Kansas 66064

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

ART GREENLEE  
193 Maxview  
Port Ludlow, Washington 98365

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Bumgarner  
309 Pacific Ave  
Osawatomie, Kansas 66064

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John La Stella  
7000 Ware Rd  
Charlotte, North Carolina 28212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ed Fiedler  
12325 Limerick Ave  
Austin, Texas 78758



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margarita Perez  
13859 Graber Ave  
Sylmar, California 91342

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dan Sherwood  
1719 SE 35th Ave  
Portland, Oregon 97214

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dan Goldberg  
2120 N Pacific Ave  
Santa Cruz, California 95060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leslie Lund  
83 Broadway  
Apt 1

Kingston, New York 12401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Vogt  
269 Bias Dr E  
Fairbanks, Alaska 99701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

jennifer valentine  
313 1st Ave  
Massapequa Park, New York 11762

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Jaffee  
4723 NE 14th Ave  
Portland, Oregon 97211



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Hodges  
Charlotte, North Carolina 28205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Scholl  
514 Prospect Ave  
Neptune, New Jersey 7753

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rhoda Levine  
18 E 8th St  
New York, New York 10003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Greene  
525 Cypress St  
Chico, California 95928

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lillian Nordin  
N8851 Wm. Severson Rd.  
Holmen, Wisconsin 54636

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harriet McCleary  
2440 Stevens Ave S  
Minneapolis, Minnesota 55404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Weill  
2169 Dolan St  
Fort Collins, Colorado 80528

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ben Goodin  
53910 5th St  
La Pine, Oregon 97739



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

heidi lynn Ahlstrand ahlstrand  
1580 State Ave NW  
Owatonna, Minnesota 55060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Morris  
625 Edgecliff Dr  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Chirpin  
18520 Vincennes St  
Northridge, California 91324

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Boucher  
618 W 15th St  
Tempe, Arizona 85281

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Schuelke  
15613 Olson Dr NW  
Lakebay, Washington 98349

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elsa Petersen  
125 SW 5th Ter  
Gainesville, Florida 32601

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tina Ann  
PO Box 265  
Bollinas, California 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Theodore Bahn  
Pensacola, Florida 32534



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wendy Tsien  
85200 Ridgetop Dr  
Eugene, Oregon 97405

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Oliver  
280 Summer St  
Boston, Massachusetts 2210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol L Else  
9702 Veterans Dr SW  
Lakewood, Washington 98498

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Noah Hanmer  
130 Sunrise Dr  
Bristol, Rhode Island 2809

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mal Gaff  
501 W Ocean Ave  
Lompoc

Lompoc, California 93436

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Denise Lenardson  
8772 1/2 Wyngate St  
Sunland, California 91040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pattty Bonney  
8625 SW Oleson Rd  
Portland, Oregon 97223



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Keith Brown & Teresa Robbins  
21 Malfait Tracts Rd  
Washougal, Washington 98671

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Poxon  
2708 Matheson Way  
Sacramento, California 95864

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

CAROL MASUDA  
4519 N Paulina St  
Chicago, Illinois 60640

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorenz Steininger  
13 Main St  
Stafford, Virginia 22554

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Terri Vasko  
128 W Liberty Rd  
Slippery Rock, Pennsylvania 16057

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kalama Reuter  
Po Box 2376  
White Salmon, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Raymond Wager  
5236 Dunton Rd  
Middlesex, New York 14507

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katherine Holmes  
Private  
Ann Arbor, Michigan 48104



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bob Thomas  
2001 Weaver Rd  
Myrtle Creek, Oregon 97457

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Cleveland  
713 Valley Way  
Santa Clara, California 95051

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ben Goodin  
53910 5th St  
La Pine, Oregon 97739

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barb Bailey  
16199 Old State Rd  
Middlefield, Ohio 44062

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

P Anna Johnson  
6934 NE 13th Ave  
Portland, Oregon 97211

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

L Adams  
28421 Cerveza Ct  
Escondido, California 92026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bonnie Margay Burke  
Po Box 601493  
San Diego, California 92160

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen fisher  
2575 Mountain View Rd  
Ferndale, Washington 98248



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judy Savard  
5138 Spruce St  
Laona, Wisconsin 54541

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

M Langelan  
7215 Chestnut St  
Chevy Chase, Maryland 20815

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Eisenberg  
1005 S Hawthorne Dr  
Bloomington, Indiana 47401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jessica Czereszka  
928 NE Simmental St  
Hillsboro, Oregon 97124

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Beitel  
Villa Avenue  
Pitman, New Jersey 8071

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Honorable+Tiffany Snyder+--+Mayor+of+Ward,+Colorado+(Ret.)  
175 S 35th St  
Boulder, Colorado 80305

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

M Leszczynski  
1535 Lincolnshire Dr  
Lapeer, Michigan 48446

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate Transchel  
336 Mission Serra Ter  
Chico, California 95926



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carina Ramirez  
240 Smith  
El Paso, Texas 79907

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pamela VourosCallahan  
11761 Adams Rd  
Granger, Indiana 46530

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tara Kerr  
1018 Bold Springs Rd  
South Boston, Virginia 24592

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phyllis Schmidt  
50 Stackpole St  
Lowell, Massachusetts 1852

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

pinkyjain pan  
757) e speedway  
Tucson, Arizona 85710

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cj Gainer  
4500 Palatine Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julia Stavenhagen  
1113 SW 51st St  
#19

Lincoln City, Oregon 97367



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Caso  
1444 N 250 W  
Clearfield, Utah 84015

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Arthur Noble  
88570 Trout Pond Ln  
Bandon, Oregon 97411

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brian Gingras  
52 Bradford Commons Ln  
Braintree, Massachusetts 2184

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

sharilyn cohn  
128 NE 43rd Ave  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kalama Reuter  
Po Box 2376  
White Salmon, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tim Porter  
6109 N Star Dr  
Panama City, Florida 32404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Malgorzata Schmidt MD, PhD  
134 Quartz Ln  
Elgin, TX

Elgin, Texas 78621



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sally Sorensen  
Blank  
Westerly, Rhode Island 2891

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donny Seals  
1117 Marlowe Dr  
A2

Clarksville, Indiana 47129

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Evelyn Pietrowski-Ciulo  
1145 Madison St NE  
Salem, Oregon 97301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Samuel Durkin  
5048 Lakeview Cir  
Vallejo, California 94534

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anthony Flores  
839 W Alexander Rd  
Valley Grove, West Virginia 26060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deirdre Downey  
330 3rd Ave  
Fairbanks, Alaska 99701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Fletcher  
Mountain Center, California 92561



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chuck Tribbey  
1237 Vista Del Lago  
San Luis Obispo, California 93405

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Guier  
255 W 108th St  
New York, New York 10025

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Christopher Seymour  
9326 Cropper Island Rd  
Newark, Maryland 21841

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phil Klein  
454 Sierra Trl  
Coralville, Iowa 52241

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dorothy Chamberlin  
Colorado Springs, Colorado 80905

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judy Moran  
6109 N Star Dr  
Panama City, Florida 32404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen Stapler Crowell  
Po Box 1058  
Grants Pass, Oregon 97528

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Colleen McMullen  
6074 Antelope Trl  
Kanab, Utah 84741



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tracey Katsouros  
1322 Harwich Dr  
Waldorf, Maryland 20601

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Clay Thompson  
2188 Lowell Point Rd  
Camano Island, Washington 98282

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donald Garner  
589 NW Country View Rd  
White Salmon, Washington 98672

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Candie Glisson  
100 Woods Edge Ct  
West Lafayette, Indiana 47906

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rochelle La Frinere  
783 Goetschl St  
San Diego, California 92114

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kevin Silvey  
Largo, Florida 33777

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karl Koessel  
330 Myrtlewood Ln  
McKinleyville, California 95519

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tim Fleischer  
416 Creel Ave  
Louisville, Kentucky 40208



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Dahlgren  
96 Silver Ln  
East Hartford, Connecticut 6118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Beth Darlington  
124 Raymond Ave  
Poughkeepsie, New York 12603

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alan Harper  
3330 Warner Rd  
Richmond, Virginia 23225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Aziz  
4931 Flame Ln  
Sarasota, Florida 34232

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Reese  
68 Old Pioneer Rd  
Camp Hill, Pennsylvania 17011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elaine Becker  
2514 Sharmar Rd  
Roanoke, Virginia 24018

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Agnieszka Beletsky  
East New Market, Maryland 21631

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Casner  
2324 W Port Au Prince Ln  
Phoenix, Arizona 85023



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Dawley  
North Truro, Massachusetts 2652

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Thomas  
5900 Hathaway Ln  
Chapel Hill, North Carolina 27514

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Theodore Bahn  
Pensacola, Florida 32534

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Weynand  
122 Meadowood Ln  
San Antonio, Texas 78216

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Blake Wu  
Lafayette, California 94549

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Uiterwyk  
7628 Fieldstone Ranch Sq  
Vero Beach, Florida 32967

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Samuel Newman  
5245 Brook Way  
Columbia, Maryland 21044

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Drumright  
1434 E Main St  
Murfreesboro, Tennessee 37130



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brian Ainsley  
1227 Pine Needle Ct  
Altamonte Springs, Florida 32714

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Lebert  
7401 Valley Forge Rd  
Brighton, Michigan 48116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bob Brucker  
4502 8th Ave E  
Bradenton, Florida 34208

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chuck Graver  
32 Cotherstone Dr  
Vincentown, New Jersey 8088

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pamela Brocius  
340 E 93rd St  
New York, New York 10128

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Campbell  
472 Arbella Loop  
Lady Lake, Florida 32162

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deb Hirt  
209 W Lakeview Rd  
Stillwater, Oklahoma 74075

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Seltzer Seltzer  
11 W Ridge Rd  
Media, Pennsylvania 19063



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jason Steadmon  
677 Ave M  
Boulder City, Nevada 89005

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Gotvald  
528 Monti Cir  
Pleasant Hill, California 94523

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Dzubak  
69 Elton Ave  
Trenton, New Jersey 8620

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pat Holbrook  
McCarty Road  
Clintwood, Virginia 24228

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Bordenave  
951 N Adoline Ave  
Fresno, California 93728

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harold Robinson  
Talladega, Alabama 35160

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynne Bannerman  
4800 Fremont Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gerry Walsh  
26 Hillcrest Ave  
Brewster, New York 10509



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Beaulieu  
7420 NW 4th St  
Fort Lauderdale, Florida 33317

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

T. F.  
East 27th Street  
New York, New York 10016

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Cote  
Sugarbluff  
Clermont, Florida 34715

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeanine Fair  
W14196 Selwood Road  
Prairie du Sac, Wisconsin 53578

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Garber  
York, Pennsylvania 17406

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Alexander  
Box 4752  
Lutherville Timonium, Maryland 21093

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Dicarlo  
10765 E Wallflower Ln  
Florence, Arizona 85132

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristin Gonzalez  
9445 SW 40th St  
Miami, Florida 33165



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Constance Graham  
300 Linden Ponds Way  
Hingham, Massachusetts 2043

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Ringle  
7113 Heather Rd  
Macungie, Pennsylvania 18062

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Iris Rochkind  
78-3 19th Dr  
EAST ELMHURST, New York 11370

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dick Dierks  
218 E Harris St  
Appleton, Wisconsin 54911

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Pascoe  
2502 Hartford Rd  
Austin, Texas 78703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Caroline SÃ©villa  
4 allÃ©e marc chagall  
Champs sur merne, New York 77420

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sally Abrams  
138 Cortland Ave  
San Francisco, California 94110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Ryland  
Ashland, Oregon 97520



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frank Myers  
3041 Old Creek Rd  
Middleton, Wisconsin 53562

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marta Guttenberg  
226 W Rittenhouse Sq  
Philadelphia, Pennsylvania 19103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Esther Garvett  
10431 SW 143rd Ave  
Miami, Florida 33186

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dave Shelman  
36141 SE Hurlburt Rd  
Corbett, Oregon 97019

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dk Weamer  
Shawnee, Kansas 66203

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Smith  
8524 NE Thompson St  
Portland, Oregon 97220

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Sharp  
312 Marshall St  
Grass Valley, California 95945

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carolyn Haupt  
1518 Minor Ridge Ct  
Charlottesville, Virginia 22901



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane O'donnell  
28 Haven Espl  
Staten Island, New York 10301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rachel Hibbard  
3139 NW Vaughn St  
Portland, Oregon 97210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Schaef  
715 Limber Rd  
Meadville, Pennsylvania 16335

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rhonda Danner  
4121 Stonewall Cir  
Dayton, Ohio 45415

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Valeri Fornagiel  
343 Kelly Rd  
Wellsboro, Pennsylvania 16901

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katelyn Entzeroth  
3850 N Mississippi Ave  
Apartment A411

Portland, Oregon 97227

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathryn Burns  
12610 Riata Trace Pkwy  
Austin, Texas 78727



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael G Smith  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Celeste Anacker  
2814 Miradero Dr  
Santa Barbara, California 93105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hillary Bryan  
Portland, Oregon 97214

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sky Yeager  
4400 NW Walnut Blvd  
Corvallis, Oregon 97330

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Clayton Burford  
5277 Todd Ct N  
Salem, Oregon 97303

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judy Shively  
1475 Imperial Ave  
San Diego, California 92113

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Suzanne Cook  
2584 Knox Cove Dr  
McKinleyville, California 95519

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peggy J Printz  
7729 57th Ave NE  
Seattle, Washington 98115



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

john S  
1234 cook  
Portland, Oregon 97212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jynx Houston  
7605 SE Lincoln St  
Portland, Oregon 97215

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Robison  
341 Lighthouse Ln  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Carmichael  
1639 Sycamore St  
Cincinnati, Ohio 45202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathy Oppenhuizen  
8135 Olive Trl  
West Olive, Michigan 49460

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jared Cornelia  
125 Denn Pl  
Wilmington, Delaware 19804

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virginia Mendez  
1836 Rodman St  
Hollywood, Florida 33020

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

louis gauci  
145 York Str  
Newport, Kentucky 41071



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Long  
3117 S Prairie Ave  
Chicago, Illinois 60616

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amy Harlib  
212 W 22nd St  
New York, New York 10011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pamela Yates  
890 NW 6th St  
Gresham, Oregon 97030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Monica Mckeown-Gallicho  
5476 Roundtree Pl  
Concord, California 94521

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

BC Shelby  
1040 NW 10th Ave  
Portland, Oregon 97209

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eva Kronen  
Eugene, Oregon 97404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Probyn Gregory  
10877 Deliban Ave  
Tujunga, California 91042

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lisa Hughes  
1713 Moody  
Galveston, Texas 77550



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Louis Palazzini  
930 Tucson St  
Aurora, Colorado 80011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fay Forman  
355 8th Ave  
New York, New York 10001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harvinderjit Saran  
45605 Graystone Ln  
Canton, Michigan 48187

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

June Cattell  
200 Pineview Rd  
West Columbia, South Carolina 29169

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rev. Max Burg  
4746 S Woodlawn Ave  
Chicago, Illinois 60615

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tim Duda  
340 Queen Anne Ct  
San Antonio, Texas 78209

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gret Rowe  
63075 Caswy  
Bend, Oregon 97703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Carroux  
2203 Hastings Dr  
Belmont, California 94002



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Voorhies  
6212 Olohena Rd  
Kapaa, Hawaii 96746

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lanie Johnson  
703 A St  
Sandpoint, Idaho 83864

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marina Morrone  
1 Martin Rd  
Yonkers, New York 10701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Nadreau  
24191 Dial Ave  
Tomah, Wisconsin 54660

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matt Loper  
38 Mark Dr  
Tiverton, Rhode Island 2878

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Haslag  
10513 Bryant Rd  
Centertown, Missouri 65023

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Georgia Johnston  
13935 SW Secretariat Ln  
Beaverton, Oregon 97008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Norda Gromoll  
1717 Watersmeet Lake Rd  
Eagle River, Wisconsin 54521



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Teevan  
171 S Lake Dr  
Red Bank, New Jersey 7701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

MARTY BOSTIC  
183 Holmwood Ave.  
, Unknown

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robbie White  
1401 Billman Ln  
Silver Spring, Maryland 20902

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlotte Sines  
3014 Arcadia St #202  
Yosemite National Park, California 95389

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Blackburn  
2563 Kensington Way  
Elizabethtown, Kentucky 42701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Devon Seltzer  
5856 Old Oak Ridge Rd  
Greensboro, North Carolina 27410

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jon Bazinet  
15972 Via Paro  
San Lorenzo, California 94580

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Emily Sagovac  
14913 Paddock Dr  
West Palm Beach, Florida 33414



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Caroline Mead  
728 Carriage Hill Dr  
Glenview, Illinois 60025

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Naji  
Marietta, Georgia 30060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John And Jean Fleming  
21364 Hytrail Cir  
Lakeville, Minnesota 55044

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephanie Asplund  
1444 W 570 N  
Clearfield, Utah 84015

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Meghan Frost  
57 Quarry Village Rd  
Cheshire, Connecticut 6410

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

A D  
Monongahela, Pennsylvania 15063

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dan Esposito  
1510 N Rowell Ave  
Manhattan Beach, California 90266

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harriet Edith Roberts  
2510 Woodland Dr  
Eugene, Oregon 97403



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jodi Daniels  
101 Queens Gate  
Maylene, Alabama 35114

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Gunther  
5636 N Spaulding Ave  
Chicago, Illinois 60659

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca Bierbaum  
3719 Horn Ave  
Alton, Illinois 62002

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

N B  
6839 7th Ave  
Kenosha, Wisconsin 53143

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kimberly Wiley  
72 Chimney Hill Rd  
Rochester, New York 14612

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Watters  
1940 Breyman St NE  
Salem, Oregon 97301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ron Faich  
9400 Snow Heights Blvd NE  
Albuquerque, New Mexico 87112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Mccarthy  
326 Old Bethel Church Rd  
Winchester, Virginia 22603



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tracy Pease  
119 Regan St  
Rockford, Illinois 61107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lauri Desmarais  
320 Trinity Ridge Dr  
Wright City, Missouri 63390

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Priscilla Lane  
5529 SE Morrison St  
Portland, Oregon 97215

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wayne Langley  
1001 Capetown Dr  
Grand Prairie, Texas 75050

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Smith  
Washington, Utah 84780

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Eisenhower  
7628 Fieldstone Ranch Sq  
Vero Beach, Florida 32967

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

JL Charrier  
1910 Heritage Dr  
Wayzata, Minnesota 55391

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Wellington  
Tucson, Arizona 85704



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Holeman  
Winter Haven, Florida 33881

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kelly Riley  
902 Bent Rd  
Hatfield, Pennsylvania 19440

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pat Blackwell-Marchant  
5737 Medallion Ct  
Castro Valley, California 94552

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vic Bostock  
1612 Woodglen Ln  
Altadena, California 91001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Resner  
7607 Middle Dr  
Greensboro, North Carolina 27409

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilyn Shepherd  
Po Box 715  
Trinidad, California 95570

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vicki Tomola  
Bx 744  
Point Arena, California 95468

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bernita B Smith  
6955 Carlisle Ct  
Naples, Florida 34109



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lauren Fenenbock  
519 Mississippi  
El Paso, Texas 79902

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Steele  
24561 La Hermosa  
Laguna Niguel, California 92677

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Coates  
217 Brookmeade Cir  
WHITE RIVER JUNCTION, Vermont 5001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Craig Kleber  
345 S Anita Ave  
Los Angeles, California 90049

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laurie Toner  
554 Washington St  
BRIGHTON, Massachusetts 2135

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Annie Mccuen  
1825 Fairmount Ave S  
Salem, Oregon 97302

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gene Griswold  
2385 Silver Gray Rd  
Mosier, Oregon 97040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Papandrea  
110 W 90th St  
New York, New York 10024



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Jehn  
180 S Atlantic Ave  
Cochran, Pennsylvania 16314

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Espasandin  
11748 Robson Road  
Grafton, Ohio 44044

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Keiko M.  
9 Mayfair Dr  
San Francisco, California 94118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claudia Kaplan  
4911 Victoria Dr  
Durham, North Carolina 27713

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gwen Hadland  
Box 3393  
Hillsboro, Oregon 97123

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Casee Maxfield  
Apt 213 1737 N Sycamore Ave  
Los Angeles, California 90028

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joyce Leggatt  
173 NE Bridgeton Rd  
Portland, Oregon 97211

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Armando A. Garcia  
16710 Orange Ave  
Paramount, California 90723



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patti Jo Arcana  
2034 NE 40th Ave  
Portland, Oregon 97212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lisa Mazzola  
1723 W Followthru Dr  
Tampa, Florida 33612

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shirley Collins Collins  
5555 Baden Way  
Eugene, Oregon 97402

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Nagy  
8321 SW 32nd Ter  
Miami, Florida 33155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Dobson  
Hendersonville, North Carolina 28792

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anna Shaughnessy  
2529 State Rte 534  
Geneva, Ohio 44041

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary F Platter-Rieger  
2104 Crenshaw St  
San Diego, California 92105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Raymond Valinoti, Jr.  
16 Warren Pl  
New Providence, New Jersey 7974



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harold Watson  
3250 W Page St  
Springfield, Missouri 65802

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donna Smith  
Havertown, Pennsylvania 19083

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Juanita Westberg  
17035 Deodar  
Hesperia, California 92345

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karol Dietrich  
44401 E Hist Columbia River Hwy  
Corbett, Oregon 97019

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

linda Paleias  
3300 NE 36th St  
Fort Lauderdale, Florida 33308

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrew Wadsworth  
125 W 33rd St  
Reading, Pennsylvania 19606

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Beth Jane Freeman  
1265 Hawthorne Dr E  
Wantagh, New York 11793

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claudette Schiratti  
3726 Locust St  
Kansas City, Missouri 64109



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rene Bobo  
Colorado Springs, Colorado 80920

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gavin Bornholtz  
9090 Creekwood Lake Trl  
Grand Blanc, Michigan 48439

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Marsden  
1872 Howard St N  
Saint Paul, Minnesota 55109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

K L  
90 D  
Roseburg, Oregon 97470

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donald Harland  
Po Box 2080  
Candler, North Carolina 28715

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Schacht  
1330 Whittier  
Grosse Pointe, Michigan 48230

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Hollinrake  
Morninside Ave  
New York, New York 10026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shawn Johnson  
951 Stratford Dr  
Encinitas, California 92024



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Silverwood  
2970 Chapel Valley Rd  
Madison, Wisconsin 53711

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Lambart  
Portland, Oregon 97217

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Asano Fertig  
11 Virginia Gdns  
Berkeley, California 94702

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brieaux Poche  
P.O. Box 536  
Ponchatoula, Louisiana 70454

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Travis Bertram  
232 Griffin Hill Rd  
Monticello, Kentucky 42633

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phillip Callaway  
PO Box 542  
Crawfordsville, OR

Crawfordsville, Oregon 97336

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Koritz  
12104 Ashford Gables Dr  
Atlanta, Georgia 30338



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mike Krouse  
14306 Detroit Ave  
Lakewood, Ohio 44107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Dragon  
187 Waterford St  
Gardner, Massachusetts 1440

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilyn Have A Wonderful Party - You Deserve It.  
16 Long Hill Rd  
Peterborough, New Hampshire 3458

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julie Bush  
6210 Cornell Dr  
Corpus Christi, Texas 78414

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claire Cohen  
5051 Foothills Dr Unit B  
Lake Oswego, Oregon 97034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brendalee Lennick  
420 E Park Ave  
Tallahassee, Florida 32301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Takako Ishii-Kiefer  
11 Winter Pl  
Matawan, New Jersey 7747

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeffrey Obermeier  
3222 NE 51st Ave  
Portland, Oregon 97213



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bernardo Alayza Mujica  
133 Durand Ave  
Sioux City, Iowa 51111

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Greg Destro  
1223 S 9th St  
Independence, Oregon 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Carol Edwards  
PO Box 247  
Cloverdale, Oregon 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bruce Olson  
12527 Connell Dr  
Shawnee Mission, Kansas 66213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Berliner  
2160 Laurel Canyon Blvd  
Los Angeles, California 90046

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stan Robinson  
4627 SW 29th Pl  
Portland, Oregon 97239

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Betsy A Leonard  
71 River View Pl  
Parachute, Colorado 81635

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Albert Gamble  
25 Sampan Ave  
Jamestown, Rhode Island 2835



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Csuhata  
2130 NW 53rd St  
Lincoln, Nebraska 68528

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margaaret Goodman  
51 Broomall Ln  
Glen Mills, Pennsylvania 19342

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Puckett  
2212 Glen Vista Dr  
Sparks, Nevada 89434

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rowan Everard  
7645 N Drummond Ave  
Portland, Oregon 97217

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ron Katz  
13337  
Huntington Woods, Michigan 48070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Melloh  
47 Sprague St  
South Portland, Maine 4106

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andi Shotwell  
3575 Pierce St  
Wheat Ridge, Colorado 80033

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susi Brothers  
, Oregon



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maryellen Redish  
671 S Riverside Dr  
Palm Springs, California 92264

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Raymond Keeling  
762 Panorama Dr  
Milford, Michigan 48381

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Annah Gardner  
1906 1st Ave S  
Minneapolis, Minnesota 55403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

K Kay Bircher  
2327 N Hacienda Dr  
Benson, Arizona 85602

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Bourlotos  
1 Rutgers Ct  
Belleville, New Jersey 7109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roger Harkness  
5830 NW 32nd St  
Oklahoma City, Oklahoma 73122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Geri Collecchia  
360 E South Water St  
Chicago, Illinois 60601

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Melanie Feder  
381 Sunshine St  
Philomath, Oregon 97370



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lenore Reeves  
19934 Hickory Stick Ln  
Mokena, Illinois 60448

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kelly Brignell  
1747 SW Sunset Blvd  
Portland, Oregon 97239

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Mckillip  
5 Farmhouse Rd  
Sicklerville, New Jersey 8081

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virginia Rice  
Box 2124  
Ketchum, Idaho 83340

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wendy Diamond  
523 Santa Barbara Rd  
Berkeley, California 94707

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

D'anne Macneil  
1718 S Longmore  
Mesa, Arizona 85202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Philip Shook  
1020 E Apache Blvd  
Tempe, Arizona 85281

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lauren Murdock  
3940 Via Lucero  
Santa Barbara, California 93110



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teresa Sullivan  
3586 Tacoma Ave  
Los Angeles, California 90065

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Oscar Revilla  
Cliffside, North Carolina 28024

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rich Moser  
1103 W Micheltorena St  
Santa Barbara, California 93101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Browne  
1012 Hanover Ln  
Ponte Vedra, Florida 32081

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mrgaret Wood  
2921 Portage St  
Naperville, Illinois 60564

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roger Williams  
7259 Eagle Rd  
Indianapolis, Indiana 46278

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matt Brzezinski  
21216 Briar Ct  
Saint Clair Shores, Michigan 48081

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rita Lemkuil  
2410 Mirro Dr  
Manitowoc, Wisconsin 54220



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilyn Clark  
Williamsburg, Virginia 23188

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Walton  
46685 Ohlson Ln  
Gualala, California 95445

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Doug Jablin  
3938 El Camino Rd  
Las Vegas, Nevada 89103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bryan Lilienkamp  
4240 N Capitol Ave  
Indianapolis, Indiana 46208

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Reynolds  
P.O.Box 185  
Albion, Maine 4910

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Neihart  
6751 Geneva Ave S  
Cottage Grove, Minnesota 55016

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Redlion York  
2001 Creekwood Dr  
Fort Collins, Colorado 80525

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alison Wasielewski  
2000 N Court St  
Fairfield, Iowa 52556



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ken Gibb  
Po Box 11616  
Zephyr Cove, Nevada 89448

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Herndon  
Burbank, California 91505

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ryan Houlette  
11 Newman St  
Cambridge, Massachusetts 2140

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alex A. Bobroff  
2301 Beau Monde Ter  
Lisle, Illinois 60532

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joan Smith  
765 Portola St  
San Francisco, California 94129

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diana Bain  
2657 Hemenway Rd  
Bridport, Vermont 5734

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nathan Hecht  
2304 W Main St  
Bozeman, Montana 59715

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan Thomas  
433n7th  
Murphysboro, Illinois 62966



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rose Wolny  
8982 E Malorie Ln  
Coolidge, Arizona 85228

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

sheryl post  
PO Box 60155  
Fairbanks, Arizona 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jacqueline Tessman  
410 Hoover Ave  
Benton Harbor, Michigan 49022

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeffrey Shuben  
46204 Delaire Landing Rd  
Philadelphia, Pennsylvania 19114

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peggy Lalor  
Hood River, Oregon 97031

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ronald Varekamp  
2302 SW Chelmsford Ave  
Portland, Oregon 97201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Glasser  
3660 Barry Ave  
Los Angeles, California 90066

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Colleen Lobel  
8111 Kenova St  
San Diego, California 92126



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Hathaway  
5107 Passons Blvd  
Pico Rivera, California 90660

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathy Bradley  
1220 Fredericksburg Dr S  
Lugoff, South Carolina 29078

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Wiant  
117 E Pak Ln  
Glenolden, Pennsylvania 19036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Ratzlaff  
645 Carr Ave  
Santa Rosa, California 95404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lori Triggs  
8445 SW 104th Pl  
Ocala, Florida 34481

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen D. Felts  
10994 Chapel Woods Blvd S  
Noblesville, Indiana 46060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet H.  
93653 Blue Bird Ln  
North Bend, Oregon 97459

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Petrulias  
23 Silvia Dr  
Cazadero, California 95421



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rick Ray  
30649 NE Hurt Rd  
Troutdale, Oregon 97060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andra Heide  
2653 Tulip Hill Rd  
Milton, Florida 32571

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ronald Clayton  
545 E Dorsett Ave  
Asheboro, North Carolina 27203

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dana Linder  
261 Summer St  
Woonsocket, Rhode Island 2895

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tracey Mangus  
1420 4th Ave  
Ford City, Pennsylvania 16226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeff Kulp  
9125 Sulkirk Dr  
Raleigh, North Carolina 27617

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Don Thompson  
11 Blackstone St  
Cambridge, Massachusetts 2139

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlie Holland  
Roaring Brook Rd  
Killington, Vermont 5751



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Louise Quigley  
41 Bower Rd  
Braintree, Massachusetts 2184

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Lance  
2711 Anuenue St  
Honolulu, Hawaii 96822

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wynne Corson  
3355 N Racine Ave  
Chicago, Illinois 60657

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David J. Lafond  
70 Brown Ave  
Holyoke, Massachusetts 1040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gerritt And Elizabeth Baker-Smith  
338 Braeside Ave  
East Stroudsburg, Pennsylvania 18301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ken Box  
1117 W 9th St  
Austin, Texas 78703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wf Clement  
152 Kent Oaks Way  
Gaithersburg, Maryland 20878

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carl Stapler  
104 Grandview Cir  
Evanston, Wyoming 82930



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

M. Rita Olson  
3270 NE Emerson St  
Portland, Oregon 97211

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

alana willroth  
1605 Birch Lake Ave  
Saint Paul, Minnesota 55110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Swersey  
Flagstaff, Arizona 86001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frederick Hamilton  
12271 Wintergreen St  
Rancho Cucamonga, California 91739

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pat Chambers  
Boise  
Boise, Idaho 83704

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bonnie Goss  
4840 Fremont St  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Smith  
Melvindale, Michigan 48122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

T Hamboyan Harrison  
125 Gravel Run Rd  
Grasonville, Maryland 21638



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephanie Clark  
Concord, California 94520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Schwartz  
21-36 33rd Rd  
ASTORIA, New York 11106

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randy Harrison  
4051 Wagner St  
Eugene, Oregon 97402

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Berman  
2424 Spaulding Ave  
Berkeley, California 94703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Edwards  
4580 E Weatherby Ave  
Post Falls, Idaho 83854

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Lynn Parodi  
12045 SW Springwood Dr  
Portland, Oregon 97223

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Mccorry  
230 Pacific St  
Santa Monica, California 90405

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marguery Lee zucker  
1966 Orchard St  
Eugene, Oregon 97403



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann McGill  
1947 Rocklyn Dr  
Brunswick, Ohio 44212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlotte Walker  
73 Kehner Rd  
Steelville, Missouri 65565

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Martinsen  
3553 Basswood Ct NW  
Salem, Oregon 97304

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Ashcraft  
2104 Juanita Ln  
Sacramento, California 95825

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Blandford  
2800 Randy St  
Amarillo, Texas 79124

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Ryerson  
5540 Oles Dr N  
Indianapolis, Indiana 46228

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Douglas Kinney, D.M.D.  
525 Crawford Rd  
Otego, New York 13825

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ronald & Debbie Reed  
7510 S. Mountain Springs  
Spokane, Washington 99223



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brianna Claire Olson  
P.O Box 7591  
 Surprise, Arizona 85374

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Raymond Arent  
1 Belleview Dr  
Severna Park, Maryland 21146

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Mckee  
9 Chadwick Ct  
Amherst, Massachusetts 1002

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Debra Moser  
4414 N Haight Ave  
Portland, Oregon 97217

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hugh Cochran  
355 Santa Clara Ave  
Eugene, Oregon 97404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary A. Mckenna  
135 W Gorgas Ln  
Philadelphia, Pennsylvania 19119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rose Marie Wilson  
32 Willowood Dr  
Wantagh, New York 11793

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Cameron  
1517 Concord Cir  
College Station, Texas 77845



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Crouser  
600 Wintergreen Dr  
Chatham, Illinois 62629

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karlene Gunter  
472 French Rd  
Rochester, New York 14618

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eileen Coffee  
Aberdeen, Maryland 21001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julie Skelton  
40900 Bemis Rd  
Belleville, Michigan 48111

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joseph Zakrzewski  
1450 Golden Gate Ave  
San Francisco, California 94115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

A. Todd  
Po Box 41783  
Eugene, Oregon 97404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ryan Beam  
331 S 1000 E

4

Salt Lake City, Utah 84102



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynda Barondes  
Bisbee, Arizona 85603

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristin Gross  
4429 NE 66th Ave  
Portland, Oregon 97218

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

R C  
321 Clay St  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Always  
10511 W Kingswood Cir  
Sun City, Arizona 85351

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Russell Weisz  
319 Laguna St  
Santa Cruz, California 95060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frank Belcastro  
285 N Grandview Ave  
Dubuque, Iowa 52001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Sentesy  
1105 Old Boalsburg Rd  
State College, Pennsylvania 16801

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dee Randolph  
336 Mission Serra Ter  
Chico, California 95926



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Tucker  
200 Norwood Ave  
Logan, Ohio 43138

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jl Angell  
Ponderosa Road  
Rescue, California 95672

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Mace  
2933 Rich Acres Dr  
Nashville, Tennessee 37207

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorraine Brabham  
1313 Grand St  
Hoboken, New Jersey 7030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Caryn Cowin  
317 Monterey Rd  
South Pasadena, California 91030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nezka Pfeifer  
303 Lakewood Manor  
Scranton, Pennsylvania 18505

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Siegner  
9640 SW Lancaster Rd  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Sercombe  
Royal Oak, Michigan 48073



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Upton  
7246 SE 141st Ave  
Portland, Oregon 97236

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

AnnMarie McCann  
571 Bellaire Dr  
Venice, Florida 34293

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Kreiner  
2307 Arrow St  
Carpentersville, Illinois 60110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric West  
3943 S Peninsula Dr  
Daytona Beach, Florida 32127

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Ruhl  
16 Joe Ent Rd  
Flemington, New Jersey 8822

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randall Nerwick  
3438 SE Mary Ct  
Portland, Oregon 97222

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Brexel Sr.  
12085 Wexford Overlook  
Roswell, Georgia 30075

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sheila Miller  
235 Inverness Ln  
Longmeadow, Massachusetts 1106



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rod Terry  
1010 NW 32nd St  
Corvallis, Oregon 97330

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura M. Ohanian  
P.O. Box 811  
Eugene, Oregon 97402

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mike Butche  
2660 Carriage Ct  
Aurora, Illinois 60504

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

S. Nam  
165 Bennett Ave  
New York, New York 10040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

L. Fielder  
2234 Carmel Dr  
Carrollton, Texas 75006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Megan Warren  
202 W Locust St  
Bloomington, Illinois 61701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Krause  
49 Austain Ave  
Albany, New York 12205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teresia Lafleur  
Sudbury, Massachusetts 1776



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robin Briggs  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Allison Fradkin  
3616 Torrey Pines Pkwy  
Northbrook, Illinois 60062

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jody Gibson  
Jodyg8@Msn.Com  
Des Moines, Iowa 50315

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jacalyn Dinhofer  
16 W 16th St  
New York, New York 10011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ivan Russell  
51 Robinhood Rd  
Pittsburgh, Pennsylvania 15220

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Fehr  
50 Ashford Ln  
Sharpsburg, Georgia 30277

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roel Cantu  
1010 Hollyfield St  
Mission, Texas 78572

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Billy Angus  
604 N 2nd St  
Hamilton, Montana 59840



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Larry Hunt  
220 Swofford Rd  
Mossyrock, Washington 98564

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

S. Robertson  
17 Grove St  
Shrewsbury, Massachusetts 1545

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nilah M. Macdonald  
25 Whortleberry Ln  
Scituate, Massachusetts 2066

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dorothy Wayne  
7727 33rd Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jamie Green  
9727 Sweetwater Ln  
Ventura, California 93004

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Rynes  
2519 Beau Bien Ct  
Lisle, Illinois 60532

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Natalie Alexander  
46-70 Konane Pl  
Kaneohe, Hawaii 96744

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Doris Overmyer  
750 Appleberry Dr  
San Rafael, California 94903



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Natalie Van Leekwijck  
444 Munn St  
Hazard, Nebraska 68844

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Plantz  
28356 W Preston Pl  
Westlake, Ohio 44145

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Connie Allison  
Geneva, New York 14456

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate Skolnick  
545 Washington Ave  
Brooklyn, New York 11238

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diana Saxon  
4098 Market St NE  
Salem, Oregon 97301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

JOANNE KELLY  
7051 35th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cornelia Shearer  
4040 Auburn Way S  
Auburn, Washington 98092

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roy Bires  
Pittsburgh, Pennsylvania 15218



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniela Rossi  
Via Roma, 15  
Pomezia (Roma), Idaho 83210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Kelly  
900 W Tyler St  
Dalton, Georgia 30720

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

June Heilman  
8930 W Buckskin  
Pocatello, Idaho 83201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brooke Kane  
6102 Franklin Park Rd  
MC LEAN, Virginia 22101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Millie Magner  
4228 29th Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rashid Patch  
3100 Coolidge Ave  
Oakland, California 94602

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Voravee Jittipsopa  
220 Swofford Rd  
Mossyrock, Washington 98564

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jini Fisher  
11229 Issaquah Hobart Rd SE  
Issaquah, Washington 98027



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patti Harter  
118 G St NE  
Ephrata, Washington 98823

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rita Meuer  
3124 E 11th Ave  
Spokane, Washington 99202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Johnson  
PO Box 707  
Stevenson, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Erik Kingfisher  
1130 31st  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Derya Ruggles  
4121 E 16th St  
Vancouver, Washington 98661

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sally Hodson  
7025 Olga Rd  
Olga, Washington 98279

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Balbas  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julia Larsen  
5807 1st Ave NE  
Seattle, Washington 98105



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John S  
10726 Stone Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carrie Foster-Campbell  
3002 S 208th St  
apt x4

Seattle, Washington 98198

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

BETTY MORGAN  
4316 Island Crest Way  
ISLAND CREST WAY

Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lyle Anderson  
5118 Heronswood Drive  
Blaine, Washington 98230

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carole Henry  
6109 Seabeck Holly Rd NW  
Seabeck, Washington 98380

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chrsitina Gilman  
2901 S Adams St  
Seattle, Washington 98108



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

NJ Morgan  
PO Box 2393  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Grace Deluz  
14344 231st Ct NE  
Woodinville, Washington 98077

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lucas Cook  
169 23rd Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gabriel Pelly  
802 NE 40th St  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeremy Bang  
1625 E Madison St  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marjorie Curci  
Beaver, Washington 98305

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim McDonald  
4723 126th St NE  
Marysville, Washington 98271

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Craig Britton  
Po Box 583  
Port Townsend, Washington 98368



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paula McMinn  
Ellensburg, Washington 98926

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patrick Annabel  
818 E Chestnut St  
Walla Walla, Washington 99362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michelle Keating  
517 SE 99th Ave  
Vancouver, Washington 98664

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Debbie Thorn  
710 18th Ave W  
Kirkland, Washington 98033

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Newton  
37894 Melrose Dr  
Cathedral City, California 92234

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Nikkel  
2306 NE 51st Ave  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alex Mach  
4035 32nd Ave SW  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Millicent Leow  
1004 Commercial Ave  
Anacortes, Washington 98221



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marianne Edain  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Noel Orr  
1610 NE 192nd St  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sholey Argani  
417 Lincoln Ave  
Takoma Park, Maryland 20912

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bob Gendron  
6134 N Maplewood Ave  
Chicago, Illinois 60659

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet C. Wright  
318 Halvorsen Rd  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Genaze  
334 Harvard St  
Cambridge, Massachusetts 2139

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Brammer  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Sue Rudisill  
P.O. Box 13196  
Olympia, Washington 98508



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marcia Pauley  
10543 Central Valley Rd NE  
Poulsbo, Washington 98370

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helen Glidden  
419 Briar Rd  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Kensler-Prager  
Toledo, Ohio 43623

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Devine  
2002 Capitol Way S  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tami Fosmark  
17302 270th Ave SE  
Issaquah, Washington 98027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Goode  
1819 McGilvra Blvd E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Salvner  
119 E Davis Ave  
Ann Arbor, Michigan 48104

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Richter  
4115 SW Arroyo Dr  
Seattle, Washington 98146



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Meital Smith  
8036 41st Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dean Webb  
4522 36th Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Terilee Huff  
Kirkland, Washington 98034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anonymous Anonymous  
Vancouver, Washington 98665

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Forman  
351 W 24th St  
New York, New York 10011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Penny Blubaugh  
7045 N Leoti Ave  
Chicago, Illinois 60646

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Millicent Leow  
1004 Commercial Ave  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan von Lehe  
Seattle, Washington 98117



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robin Briggs  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Klaudia Englund  
7630 Cypress Way  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leon Robert  
5815 6th Ave NW  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilee Corey  
5200 Pettyjohn Rd S  
Salem, Oregon 97302

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

No More Dirty Fuel!!  
San Diego, California 92117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anthony Albert  
664 NW 18th St  
Corvallis, Oregon 97330

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

PAUL KIM  
4009 City Of Oaks Wynd  
Raleigh, North Carolina 27612

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan Stone  
17352 SW Sugar Plum Ct  
Beaverton, Oregon 97007



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

CAROL MASUDA  
4519 N Paulina St  
Chicago, Illinois 60640

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lisa Canar  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ben Rall  
2217 W Crown Ave  
Spokane, Washington 99205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Wirth  
101 Boylston Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeanne Keckler  
140 Lakeside Ave  
Ste. A-#333

Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tina Brown  
5526 Sugarloaf St  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kevin Gallagher  
15866 36th Ave NE  
Seattle, Washington 98155



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Underwood  
1809 E 31st St  
Tacoma, Washington 98404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Reevyn Aronson  
2802 Medford Ave  
Redwood City, California 94061

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Lehtinen  
1277 E Siena Heights Dr  
Adrian, Michigan 49221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Whitehead  
207 Atlanta Ave  
Tyler, Texas 75703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Melissa Hathaway  
1488 NE Olvera Ct  
Gresham, Oregon 97030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephen and Kathleen Hulick  
16607 NE 197th Ave  
Brush Prairie, Washington 98606

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Neil Bleifeld  
405 W 48th St  
APT 5FE

New York, New York 10019



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michele Timm  
PO Box 2057  
Lynnwood, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Ann Hiller  
1311 S Massachusetts St  
1303

Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Celia Okelley  
12 Hillcrest  
Tuscaloosa, Alabama 35401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lewis Gersten  
350 W 24th St  
New York, New York 10011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tami Fosmark  
17302 270th Ave SE  
Issaquah, Washington 98027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Wesley  
4446 Eden Valley Rd  
Port Angeles, Washington 98363

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brent Rocks  
1518 SW Upper Hall St  
Portland, Oregon 97201



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Debra Garner  
Po Box 355  
White Salmon, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carrie Pluger  
7307 8th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jana Vitols  
3815 25th Ave S  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alec Humphreys  
5131 S Mead St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rachel Babin  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carin Christy  
1652 Yew Ave NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Harrison  
2261 Old Gardiner  
Lot 74 Sequim, WA

Sequim, Washington 98382



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

M Boni  
23701 Meridian Pl W  
Bothell, Washington 98021

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ruth Schultz  
14021 15th Ave NE  
401N

Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nathan Eversole  
5501 W Hildebrand Blvd Apt D330  
Kennewick, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Masters  
123 Falling Tree Rd  
Orcas, Washington 98280

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Lampi  
2667 170th Ave SE  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Terry Friedman  
10 Belnay Ln  
Montvale, New Jersey 7645

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barry Weinzveg  
4444 Roblar Rd  
Petaluma, California 94952



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Williams  
35 Holly Glen Ln  
Cape May Court House, New Jersey 8210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marcel Liberge  
PO Box 277  
Murphy, Oregon 97533

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lane Hatfield  
2647 10th Ct SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathy Dawson  
5806 Greenwood Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Fleming  
312 Oaklawn Dr  
Rochester, New York 14617

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jay Roelof  
1142 NE Lakewood Dr  
Newport, Oregon 97365

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Veronica Bush  
109 Dexter Ave N  
Seattle, Washington 98109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Rimbos  
19711 241st Ave SE  
Maple Valley, Washington 98038



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ernie Walters  
Union City, California 94587

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tia Pearson  
P.O.Box 861697  
Wahiawa, Hawaii 96786

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hal Anthony  
3995 Russell Rd  
Grants Pass, Oregon 97526

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Bergner  
15515 Yokeko Dr  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Hood  
13492 Carney Lake Rd  
Port Orchard, Washington 98367

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marco De La Rosa  
12700 NE 124th St  
Kirkland, Washington 98034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharleen Mehemed  
26616 135th Ave SE  
Kent, Washington 98042

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Meyer  
2435 7th Ave W  
Seattle, Washington 98119



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Trina Cooper  
2239 SW 331st St  
Federal Way, Washington 98023

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amy Roberts  
2883 NW Sunny Ln  
Albany, Oregon 97321

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lawrence Nagel  
375 Ashland Loop Rd  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jude Green  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Kearney  
15804 SE 43rd Pl  
Bellevue, Washington 98006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John DuBois  
PO Box 1187  
Renton, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Hand  
7169 NE Hidden Cove Rd  
Bainbridge Island, Washington 98110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Miranda Marti Marti  
6709 23rd Ave NW  
Seattle, Washington 98117



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Nelson  
12618 S Harvard Rd  
Rockford, Washington 99030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pam Lux  
17502 47th Ave NE  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Katayama  
509 NE 124th St  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Schmidt  
2216 SO ROCKWOOD BV  
Spokane, Washington 99203

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Ireland, M.D.  
6001 Douglas Dr  
Yakima, Washington 98908

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bay Renaud  
Po Box 5271  
Bellingham, Washington 98227

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margaret M  
1503 Evergreen Dr  
Tacoma, Washington 98466

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Goldberg  
9225 N Cedarvale Loop Rd  
Arlington, Washington 98223



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Clark  
16724 SE 29th St  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeanne Keckler  
140 Lakeside Ave  
Ste. A-#333

Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Corpus  
Po Box 6457  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carrie Watson  
1515 22nd St  
Huntsville, Texas 77340

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maris Abelson  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julia Singer  
1801 N 107th St  
#204

Seattle, Washington 98133



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Hilliard  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Janeway  
107 Turning Wood Ln  
Lopez, Washington 98261

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

karen wylde  
27612 94th Ave SW  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brendan DeMelle  
9527 13th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Constance Knudsen  
9015 21st Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jacqueline Chambers  
322 Milroy St NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lois Canright  
11589 Martin Rd  
Rockport, Washington 98283

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vanessa Skantze  
1534 1st Ave S  
Seattle, Washington 98134



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Glenn Thureson  
4118 SW College Rd  
Ocala, Florida 34474

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Kane  
200 S Kent Pl  
East Wenatchee, Washington 98802

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sally Radford  
6438 S Warner St  
Tacoma, Washington 98409

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Morris  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sean O'Dell  
Renton, Washington 98056

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilyn Lindahl  
9562 Lake Shore Blvd NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Niles  
4131 W J St  
Bremerton, Washington 98312

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Nero  
1927 Harbor Bl  
Costa Mesa, California 92627



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margie Bone  
120 NE 53rd St  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

S Denise Henrikson  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Todd Greenwood-Geer  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carole Blakey  
PO Box 1222  
Seahurst, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Erica Meade  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate Pate  
10019 1st Ave S  
Seattle, Washington 98168

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maxine Dunkelman  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matt Buckmaster  
1111 Yew St  
Bellingham, Washington 98229



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Todnem  
6509 Mt Angeles Rd  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

john mcnevin  
1100 Fairview Ave N  
Seattle, Washington 98109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Rance  
5814 Woodlake Dr W  
University Place, Washington 98467

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael And Barbara Hill Hill  
701 Mineral Hill Rd  
Mineral, Washington 98355

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Keeler  
1102 NW 83rd St  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katharine Harkins  
1233 21st Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marianne Eddington  
20520 NE 221st Cir  
Battle Ground, Washington 98604

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hillary Tiefer  
2604 Southeast 190th Avenue  
Vancouver, Washington 98683



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

jj  
2210 Minor Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathy McFall-Butler  
Federal Way, Washington 98023

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ellen Zito  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

erika nedderman  
7313 17th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Audrey Meade  
4126 42nd Ave S  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Bayard  
4730 228th St SE  
Bothell, WA

Bothell, Washington 98021

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nadine Wallace  
2709 N Cedar St  
Tacoma, Washington 98407



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lauri Benblatt  
2407 E Union St  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Looney  
Po Box 8845  
Silverdale, Washington 98383

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sophia Keller  
851 SW 127th St  
Seattle, Washington 98146

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kylie Loynd  
2525 Minor Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Foster  
1820 Minor Ave  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristeen Penrod  
3816 31st Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Liz Wallace  
47121 SE 131st Pl  
North Bend, Washington 98045

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dirk Vermeeren  
2950 Newmarket St  
Bellingham, Washington 98226



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate O' Connor  
10519 8th Ave S  
Tacoma, WA

Tacoma, Washington 98444

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

valerie krull  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Rogers  
3035 Sheridan  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joe Mabel  
3164 NE 83rd St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Gladstone  
PO Box 803  
Snohomish, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mickie Stewart  
16820 120th Ave SE  
Renton, Washington 98058

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Whitmore  
3182 Vista Verde Ln SW  
Olympia, Washington 98512



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shasta Smith  
5930 Wilson Ave S  
Seattle, WA

Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tanya Lee  
6523 31st Ave S  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Mudd  
23708 Locust Way  
Unit 42

Bothell, Washington 98021

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Bradley  
1128 15th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patti Hoyopatubbi  
North Bend, Washington 98045

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandy Lawrence  
Bellingham, Washington 98226



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca McDonough  
Eastsound, Washington 98245

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Vavrek  
Po Box 11  
Stehekin, Washington 98852

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Franklin  
520 Ridgeway Dr  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Christian & Lea Andrade  
146 Starlight Way  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lina Oppenheimer  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Shimeall  
6634 159th Ave NE  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anita Gwinn  
41600 NE Munch Rd  
Amboy, Washington 98601

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michelle Sarnoski  
5510 Chicago Ave SW  
Lakewood, Washington 98499



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brett Johnson  
4609 N 13th St  
Tacoma, Washington 98406

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan von Lehe  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Knutzen  
25220 70th Ave NE  
Arlington, Washington 98223

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Wright  
2821 2nd Ave  
Seattle, Washington 98121

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kelsey Foster  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Howard Mizuta DDS  
7510 45th Ave SW  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lela Wulsin  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janine Graves  
PO Box 3213  
Renton, Washington 0



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Leigh  
912 17th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kara Pomeroy  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Faye Bartlett  
3382 Southbend Pl  
Bellingham, Washington 98226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Peterhans  
4730 S Pearl St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Don Worley  
1949 State Rte 25  
Kettle Falls, Washington 99141

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frank Kroger  
1504 E Alder St  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Davis  
303 Cottage Ave  
Hoquiam, Washington 98550

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chuck Ricevuto  
PO Box 615  
Oroville, Washington 0



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephen Spofford  
10326 15th Ave NE  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Riddle  
4005 91st Ave SE  
Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ron Digiacomio  
2307 22nd Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

SUONG HUYNH  
12505 NE 117th Pl  
Kirkland, Washington 98034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Candice Cassato  
6417 54th Ave NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Fenker  
1705 Sleater Kinney Rd SE  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sigrid Elenga  
Bellevue, Washington 98009

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Morris  
625 Edgecliff Dr  
Langley, Washington 98260



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marianne Kenady  
6050 31st Ave SW  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Whitehurst  
923 N Washington St  
Tacoma, Washington 98406

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Stegeman Mitchell  
1417 View Vista Park  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Butler-Minor  
7919 64th St Ct W  
University Place, Washington 98467

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Stewart  
7483 Orcas Rd  
Orcas, Washington 98280

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Yael Yanich  
1107 NE 45th St  
Suite 400

Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeffery McConaughy  
1301 24th St  
Bellingham, Washington 98225



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jai Boreen  
840 Turn Point Rd  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Doreen Abrams  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate O'Brien  
5010 47th Ave S  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Thompson  
5301 E Warm Springs Ave  
Boise, Idaho 83716

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shaylon Stolk  
1260 Republican St  
325

Seattle, Washington 98109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marilyn & Ross Barta  
16603 SE 147th St  
Renton, Washington 98059

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Zizza  
7727 9th Ave NW  
Seattle, Washington 98117



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tadd Morgan  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Blackwood  
11916 E 25th Ave  
Spokane, Washington 99206

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lillian Mcdonell  
PO Box 1222  
Seahurst, WA

Seahurst, Washington 98062

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joan and Tom Harris  
15902 13th Ave Ct E  
Tacoma, Washington 98445

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Ulrich  
4401 NW Lavina St  
Vancouver, Washington 98660

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeff Freels  
1714 Magnolia St Se  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stuart Mork  
7710 31st Ave NW  
Seattle, Washington 98117



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jillian Shea  
18111 SE 35th St  
Vancouver, Washington 98683

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ella Elman  
19711 NE 58th Pl  
Redmond, Washington 98053

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

JAMES SHEA  
193 Maxview  
Port Ludlow, Washington 98365

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Sandvig  
21727 Calhoun Rd  
Monroe, Washington 98272

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Catherine Russell  
3321 Cherry Blossom Dr NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Gipe  
8501 30th St E  
Puyallup, Washington 98371

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wendy Bowman  
2613 Judd St SE  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathryn Jacobs  
117 Eldorado Pl  
Chelan, Washington 98816



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kellie D  
2231 Tuscana Ave S  
Salem, Oregon 97306

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathleen Butt  
8845 166th Ave NE  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Lengel  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Daniels-Lee  
Po Box 1027  
Ocean Shores, Washington 98569

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Lombard  
PO Box 371  
Lopez Island, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Parker  
55 Windward Dr  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Walworth  
PO Box 919  
Lopez Island, WA

Lopez, Washington 98261



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marianne Larkins-Strawn  
16415 NE 11th St  
Vancouver, Washington 98684

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Ingman  
1121 37th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Sorell  
331 Bellevue Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anita Penuelas  
7317 56th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Scarborough  
2815 Kulshan St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Carlson  
3634 Loren St NE  
Olympia, Washington 98516

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynn Kush Kush  
1183 1st St  
Gardiner, Oregon 97441

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matt Weatherford  
2312 NE 113th St  
Seattle, Washington 98125



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Toni Mills  
1308 Seneca St

9

Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judy Avery Wayle  
24319 N Lords Ln  
Chattaroy, Washington 99003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kerry Kovarik  
341 N 102nd St  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorraine D. Johnson  
4858 S Kenny St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dina Pearl-Thomas  
2825 Franklin St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Ellenberger  
23633 112th Ave SE  
Kent, Washington 98031

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Chapman  
3805 Soundview Dr W  
Tacoma, Washington 98466



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shirley Hoh  
703 35th St  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teressa Tremaglio  
7881 Piper Ln  
Lake Worth, Florida 33463

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Wermus  
752 Dayton St  
Edmonds, Washington 98020

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Severn  
304 Straits View Dr  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Baker Smith  
11416 10th Ave S  
Seattle, Washington 98168

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Schwinberg  
4538 18th Ave NE  
Apt 8-D

Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca Nimmons  
6345 138th PI SE  
Bellevue, Washington 98006



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Brill  
13000 Linden Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Mitchell  
28 W Augusta Ave  
Spokane, Washington 99205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Walter Kuciej  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jill Blaisdell  
15619 Ok Mill Rd  
Snohomish, Washington 98290

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Angie Dixon  
6949 Humphrey Rd  
Clinton, Washington 98236

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

diane marks  
728 Caroline St  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Geoff Cole  
10421 SW Bank Rd  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Scott Washburn  
3401 W Government Way  
Seattle, Washington 98199



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Townill  
24037 W Oak St  
Plainfield, Illinois 60544

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Collum Liska  
401 17th Ave SW  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan MacGregor  
16911 NE 95th St  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sara Eldridge  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Enriques  
4280 E.S.R. 106  
Union,WA

Union, Washington 98592

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Abbott  
2209 Colby Ave  
Everett, Washington 98201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Landau  
Adelma Beach, Washington 98368



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Goodwin  
1717 Olympia Way  
Longview, Washington 98632

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Debbi Pratt  
3535 27th Pl W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bob Zeigler  
1102 Creekwood Ct SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Guerrero  
720 W 1st St  
Cheney, Washington 99004

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amberlynn Lane  
11602 NE 7th Cir  
Vancouver, Washington 98684

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bill Laestadius  
6228 84th Ave Se  
San Diego, California 92109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julia Lakey  
17312 100th Ln SW  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Allen  
PO Box 4440  
Wenatchee, Washington 98807



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fred Becker  
18210 47th PI NE  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tamara Ashley  
Po Box 1023  
Mishawaka, Indiana 46545

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Myra Lara  
711 Bellevue Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robin Bodony  
20770 Kaya Ln NE  
Indianola, Washington 98342

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Connie Nelson  
Vancouver, Washington 98684

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Kiplinger  
18004 SE 20th Cir  
Vancouver, Washington 98683

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Isaac Ehrlich  
21096 E Mountain Creek Cir  
Rhododendron, Oregon 97049

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ericka Berg  
12004 31st Ave NE  
Seattle, Washington 98125



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Loretta Arvizu  
18711 152nd Ave NE  
Woodinville, Washington 98072

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dr. Jeffrey LaGasse  
PO Box 637  
Freeland, Washington 98249

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gloria Samuels  
17426 Bothell Way NE  
A202

Bothell, Washington 98011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Evy Flynn  
8223 Lakemont Dr NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tushar Khurana  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynn Thorensen  
240 Plateau Ave  
Santa Cruz, California 95060

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shannon Welles  
4752 35th Ave S  
Seattle, Washington 98118



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Fristoe  
3418 16th Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janice Vocke  
PO Box 1664  
Shelton, Washington 98584

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jerry Kessinger  
19122 2nd Ave SE  
Bothell, Washington 98012

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Earl  
2127 Lummi Shore Rd  
Bellingham, Washington 98226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Gindt  
1513 S 32nd Ave  
Yakima, Washington 98902

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vana Spear  
1805 204th PI SW  
Lynnwood, Washington 98036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Todd Tollefson  
812 5th Ave N  
Seattle, Washington 98109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Yola Hesser  
90916 Southview Ln  
Florence, Oregon 97439



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janice Jack  
12490 N Madison Ave  
Bainbridge Island, Washington 98110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gloria McClintock  
1411 Northview Ct  
Mount Vernon, Washington 98274

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eileen Mccabe  
2201 192nd St  
Bothell, Washington 98012

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

George Vocke  
PO Box 1664  
Shelton, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dr. Demian  
10300 28th Ave SW  
Seattle, Washington 98146

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maxine Clark  
1717 Sheridan Rd  
Bremerton, Washington 98310

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kimberly Johnson  
13955 236th St N  
Scandia, Minnesota 55073

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Purcell  
218 Sea Pines Rd  
Bellingham, Washington 98229



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kaysy Ostrom  
1838 153rd Ave SE  
Bellevue, Washington 98007

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Victoria Forsberg  
992 Cedar Cir  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marty Kenney  
9723 Evanston Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Desiree Nagyfy  
1120 E Westmoreland Rd  
Deer Park, Washington 99006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Corey E. Olsen  
Delafield, Wisconsin 53018

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sophia Mcaskill  
Palatine, Illinois 60074

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Greg Goodwin  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra L Herndon  
308 Marwood Ln SW Apt 9C  
Olympia, Washington 98502



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Scott Percival  
6801 Greenwood Ave N  
#414

Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Kable  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Neil Bleifeld  
405 W 48th St  
New York, New York 10019

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Densmore  
1980 7th St W  
Saint Paul, Minnesota 55116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Haugh  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary de Rosas  
4730 S Pearl St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Barlow  
Flagstaff, Arizona 86011



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lois Hanson  
5529 40th Ave NE  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Seth Snapp  
2214 H St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Bonfield  
5702 N 33rd St  
Tacoma, Washington 98407

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vanessa Jamison  
16619a 41st Dr Ne  
Marysville, Washington 98270

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dorothy Knudson  
Po Box 2046  
Walla Walla, Washington 99362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Tandoo  
15028 64th Ave W  
Edmonds, Washington 98026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Holcomb  
2332 E Hemmi Rd  
Bellingham, Washington 98226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Kittredge  
P.O. Box 763  
Quilcene, Washington 98376



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sheldon Burkhalter  
2811 NE 65th St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nora Polk  
6405 SE 62nd Ave  
Portland, Oregon 97206

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Doane  
3635 NW 12th Ave  
Camas, Washington 98607

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diana Talbott  
1325 Regents Blvd  
Tacoma, Washington 98466

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jan Ellis  
4203 Mayvolt Rd  
Port Orchard, Washington 98366

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nicole Southwell  
3301 Beacon Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Quinn  
po box 16316  
Seattle, Washington 98116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randall Collins  
530 4th Ave W  
Seattle, Washington 98119



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Megan Baker  
1900 W Murray Dr  
Springfield, Missouri 65810

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Glen Anderson  
5015 15th Ave SE  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Albert Bechtel  
4131 11th Ave NE  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jane Mortell  
3033 NW 69th St  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vince Mendieta  
6005 Cherry Creek Dr  
Austin, Texas 78745

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Larson  
10991 W Side Potter Valley Rd  
Potter Valley, California 95469

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lise Grace  
2501 Lynn St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Selden Prentice  
3606 37th Ave W  
Seattle, Washington 98199



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Hirst  
7516 41st St Ct W  
Tacoma, Washington 98466

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrew Lyall  
3873 Bentwood Ln  
Corpus Christi, Texas 78415

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marianne Edain  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joshua Christian  
526 S 54th St  
Tacoma, Washington 98408

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Bennett  
1436 Toledo St  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marian Wineman  
3611 45th Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roni Jo Patterson  
2614 4th Ave  
APT 407

Seattle, Washington 98121



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mindi Tambellini  
11054 17th Ave SW  
Seattle, Washington 98146

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy White  
13311 E Forrest Ave  
Spokane, Washington 99216

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Colleen Gray  
3818 S 9th St  
Tacoma, Washington 98405

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlotte Underwood  
PO Box 1317  
La Conner, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Heather Davidson  
3024 NW 59th St  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Casey Holmberg  
25821 179th PI SE  
Kent, Washington 98042

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Bates  
6821 44th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Uli Johnson  
319 Sawyer St NE  
Olympia, Washington 98506



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorraine Hartmann  
10627 Durland Ne  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mr. Shelley Dahlgren, Phd  
4449 242nd Ave SE  
Issaquah, Washington 98029

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Gross  
6536 44th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Angela Cole  
6255 Telegraph  
Erie, Michigan 48133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brandon Juhl  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Erik Larue  
17567 Maiben Rd  
Burlington, Washington 98233

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynne Oulman  
816 14th St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shary B  
1950 Alaskan Way  
Seattle, Washington 98101



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

IRINA LELIKOVA  
12520 NE 134th Pl  
Kirkland, Washington 98034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Philip Palios  
16618 NE 91st St  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Derek Dexheimer  
1211 S Lucile St  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John And Aj Jittipsopa-Zinner  
220 Swofford Rd  
Mossyrock, Washington 98564

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Szafranski  
1457 Pennington Rd  
Trenton, New Jersey 8618

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leslie McClure  
13217 1st Ave NW  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leo Kucewicz  
201 Black Walnut Dr  
Phoenixville, Pennsylvania 19460

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Llyod Johnston  
13421 26th Ave NE  
Seattle, Washington 98125



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Hernandez  
Corona, California 92881

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

asukaa jaxx  
525 14th Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bonnie Faith-Smith  
290 Washington St  
Cambridge, Massachusetts 2139

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Maki  
7309 32nd Ave SW  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phoebe Quillian  
120 Faith Cir  
Talent, Oregon 97540

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jp Kemmick  
1513 E Madison St  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frances Blair  
115 Montgomery St  
Steilacoom, Washington 98388

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ruth Schaefer  
PO Box 99812  
, Unknown 98139



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ruth Neuwald Falcon  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lin Provost  
3707 42nd Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Brown  
843 NW 50th St  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gavin Tierney  
Long Beach, California 90814

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brenda Aron  
2611 R St  
Vancouver, Washington 98663

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virginia Davis  
17721 NE 156th St  
Woodinville, Washington 98072

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michaela Barrett  
4780 32nd Ave S  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Krysta Yousoufian  
6700 Roosevelt Way NE  
Seattle, Washington 98115



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharon Lieberman  
36660 Annapolis Rd  
Annapolis, California 95412

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Mccaul  
12012 Evanston Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Patterson  
Edmonds, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rosemary Trimmer  
19115 14th Ct NW  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Levin  
255 SW Harrison St  
Portland, Oregon 97201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Calista Pollack  
1504 25th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Casey Defoer  
8 Loganberry Ln  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leslie Bradford  
2107 Briarcliff Dr  
Oklahoma City, Oklahoma 73170



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Clayton Jones  
8559 Mary Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Shifley  
4450 Winslow Pl N  
Apartment #8

Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

dogan ozkan  
318 noble street, 99701  
99701

Fairbanks, Alaska 99701

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Holding  
730 Belmont Pl E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phoebe Weseley  
455 Bunn Rd  
BEDMINSTER, New Jersey 7921

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Becky Fletcher  
SEDRO WOOLLEY, Washington 98284



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Trospen  
4235 SE Holgate Blvd  
Portland, Oregon 97206

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shannon Milhaupt  
3470 W 35th Ave  
Denver, Colorado 80211

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrea Zinn  
Brooklyn, New York 11210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mark Wirth  
101 Boylston Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Sprute  
18620 52nd Ave W  
Lynnwood, Washington 98037

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amy Fisher  
4721 15th Ave SE  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Runion  
170 Kipling Ave  
Ben Lomond, California 95005

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kjersten Gmeiner  
4132 3rd Ave NW  
Seattle, Washington 98107



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shaina Oliver  
2301 Kearney St  
Denver, Colorado 80207

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Clayton Conway  
107 Pine St  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laurette Culbert  
5123 2nd Ave NW  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jim Hackman  
125 Cleveland  
Port Hadlock, Washington 98339

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Seeley Kaplan  
5226 Tolt River Rd NE  
Carnation, Washington 98014

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claire Berkwitt  
4125 221st PI SE  
Issaquah, Washington 98029

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amy Hansen  
8 Deboer Farm Ln  
Asbury, New Jersey 8802

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jovohn Hornbuckle  
329 Teakwood Ln  
Cedar Hill, Texas 75104



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leon Robert  
5815 6th Ave NW  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Borst  
60857 State Route 20  
Marblemount, Washington 98267

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helene Herman  
135 E 83rd St  
New York, New York 10028

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Denise Motta  
8038 Mackenzie Rd  
SAINT LOUIS, Missouri 63123

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lori Gudmundson  
Bellingham, Washington 98227

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Calista Pollack  
1504 25th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mindy Blaski, MD  
4909 N Territory Ave  
Tucson, Arizona 85750

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sara Woods  
5630 Lost Lake Rd  
Hood River, Oregon 97031



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lloyd Hedger  
224 N G St  
Tacoma, Washington 98403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anita Woodruff  
317 S 177th Pl  
Seattle, Washington 98148

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Reynolds  
1024 Edinborough Dr  
Durham, North Carolina 27703

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gregory Monahan  
7225 SW 13th Ave  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Hansen  
2644 Donovan Ave  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Rosenkotter  
201 Crest Dr  
Deer Harbor, Washington 98243

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

ANNIKA BROWNE  
32926 NE 140th Pl  
Duvall, Washington 98019

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randy Guthrie  
7102 77th Ave SE  
Snohomish, Washington 98290



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Shifley  
4450 Winslow Pl N  
Apartment #8

Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laurie Dils  
721 Quince St NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Gregory  
PO Box 2248  
Bellingham, Washington 98227

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Simone Adler  
2601 S Angeline St  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Page  
1209 NW Lakeview Rd  
Vancouver, Washington 98665

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dolly Marshall  
Springfield, Oregon 97477

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marc Conrad  
Chicago, Illinois 60613



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Pynchon  
1555 Union Ave NE  
Renton, Washington 98059

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sean Adair  
7043 17th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate Ague  
491 Sherwood Way  
Menlo Park, California 94025

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen O'neal  
9100 SW 80th Ave  
Portland, Oregon 97223

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Hayes  
215 N Ivy St  
Medford, Oregon 97501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristin Rivas  
6276 40th St E  
Tacoma, Washington 98424

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ellen Koivisto  
1556 Great Hwy  
San Francisco, California 94122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hilarie Ericson  
1020 NE 63rd St  
Seattle, Washington 98115



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robertta Adams  
PO Box 12833  
Olympia, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Liza Martin  
16637 NE 30th St  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Dickinson  
1322 S 18th Ave  
Yakima, Washington 98902

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elena Rumiantseva  
310 N 46th St  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peggy A Jennings  
4303 W 7th Ave  
Kennewick, Washington 99336

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patrick McKee  
9233 SE 59th St  
Mercer Island, WA

Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Dirks  
6473 E Hilldale Rd  
Port Orchard, Washington 98366



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Hedgepath  
505 NW 45th St  
Vancouver, Washington 98660

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cynthia Parker  
872 W Z St  
Washougal, Washington 98671

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephanie Clark  
135 Rice Corner Rd  
Brookfield, Massachusetts 1506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Cronin  
P.O. Box 9544  
Spokane, Washington 99201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter von Christierson von Christierson  
1229 29th  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shannon Markley  
19107 15th Ave NW  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Mecjker  
3948 Stein Ct  
South San Francisco, California 94080

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julienne Battalia  
2108 Fisherman Bay Rd  
Lopez, Washington 98261



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ellen McCann  
1262 Amalfi Pl  
Escondido, California 92027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Theresa Nuccio  
1631 16th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Wasgatt  
308 Alta Vista Ave  
Roseville, California 95678

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lane Lucht  
12255 Laurel Glade Ct  
Reston, Virginia 20191

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sheryl Feldman  
507 W Mercer St  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Speer  
410 SW Park St  
Camas, Washington 98607

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tamara Saarinen  
4418 Rosedale St NW  
Gig Harbor, Washington 98335

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

P Rathbun  
Po Box 664  
Gig Harbor, Washington 0



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca Clark  
5035 N Depauw St  
Portland, Oregon 97203

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jessica Scalzo  
1800 S Jackson St  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Liz Nedeff  
14641 SE 181st St  
Renton, Washington 98058

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Norman Dick Dick  
133 Beacon Hill Dr  
Longview, Washington 98632

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carlos Morales  
2539 James St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daniel Wend  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary N  
14005 SE 38th St  
Vancouver, Washington 98683

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Berolzheimer  
311 N 160th St  
Seattle, Washington 98133



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jarrett Cloud  
79 Central Ave  
Madison, New Jersey 7940

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katrin Sippel  
W61 62nd Street  
New York, New York 10023

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Denis Martynowych  
7020 18th Ave SW  
Seattle, Washington 98106

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jay Pine  
1723 Gise  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

asukaa jaxx  
525 14th Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Patton  
321 Rugby Ave  
Berkeley, California 94708

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Davison  
923 112th St SW  
Everett, Washington 98204

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jon Reinsch  
Seattle, Washington 98119



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jack Stansfield  
16314 62nd Ave NW  
Stanwood, Washington 98292

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Melodie Martin  
2339 11th Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Roda  
8415 Island Dr S  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

T Mo  
Inver Grove Heights, Minnesota 55076

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Roxanne Duniway  
4428 Montana Cir W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

MaryAnn M Seward Seward  
2360 Haines  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Reid  
2341 31st Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randi Holland  
3709 Clark Ave  
Vancouver, Washington 98661



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leslie McQuistin  
8410 Eastside dr ne  
Tacoma, Washington 98422

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susi Hulbert  
530 Hillcrest Dr  
Longview, Washington 98632

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brandie Deal  
15836 NE Leary Way  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Stevenson  
23851 SE 98th Pl  
Issaquah, Washington 98027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathy Haverkamp  
Geneva, New York 14456

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Nichols  
5107 NE Couch St  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steven Hoffman  
4969 Samish Terrace Rd  
Bow, Washington 98232

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pat Pearson  
Port Ludlow, Washington 98365



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Hampel  
113 Douglas Manor Ln  
Eastsound, Washington 98245

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen Plimier  
Oakland, California 94611

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mallory Musser  
Grass Valley, California 95949

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Lou Ritter  
Sammamish, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joan Hobbs  
515 E 14th North St  
Mountain Home, Idaho 83647

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Reagel  
5514 21st Ave S  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gayle B. Rosenberry  
703 Gorsuch Ave  
Baltimore, Maryland 21218

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ranell Nystrom  
1400 N 6th St  
Tacoma, Washington 98403



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gerald Stansfield  
621 40th Pl  
Everett, Washington 98201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Corey Havens  
1201 E Maple St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Pauley  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Lipman  
Rhode Island Avenue  
Providence, Rhode Island 2906

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tika Bordelon  
1400 Hubbell Pl  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Lyman  
1250 North Highway  
Colville, Washington 99114

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dorothy Jordan  
1407 Abbot Rd  
Lynden, Washington 98264

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Burns  
1023 W Alder St  
Louisville, Colorado 80027



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Schickendantz  
1458 Edgemoor Ave  
Akron, Ohio 44313

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Kaye Riley  
121 Karr Ave  
Hoquiam, Washington 98550

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michele Paxson  
2618 Cypress Ave  
East Meadow, New York 11554

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

jon longsworth  
jon@longsworth.com  
Phoenix, Arizona 85001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rohana McLaughlin  
150 San Francisco Blvd  
San Anselmo, California 94960

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leesa Burnett  
2556 NW Chardonnay Dr  
McMinnville, Oregon 97128

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mike Conlan  
6421 139th Pl NE  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chelsey Dipasquale-Hunton  
5902 22nd Ave NW  
Seattle, Washington 98107



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Fleetwood  
4220 Tc Steele Rd  
Nashville, Indiana 47448

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mia Roozen  
PO Box 323  
Concrete, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

terri sommer  
802 Walnut Ave  
Woodward, Iowa 50276

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

WILMA HACKMAN  
125 Cleveland  
Port Hadlock, Washington 98339

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Bremer  
2604 Kentucky St  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vivian Barro  
603 W Harvie Ave  
Gastonia, North Carolina 28052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Sexton  
1651 Shiloh Trl  
Clarkdale, Arizona 86324

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ryan Swank  
2210 N Mason Ave  
Tacoma, Washington 98406



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Summerlin  
133 N 78th St  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vijay Sheldan  
4337 E Hartford Ave  
Phoenix, Arizona 85032

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margaret Berger  
1717 12th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gerry Milliken  
Po Box 1880  
Oroville, Washington 98844

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Mcrae  
1231 Miller Ave NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rod Tharp  
1231 Miller Ave NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wesley Banks  
Vancouver, Washington 98682

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alec Herr  
4905 Osage  
Boulder, Colorado 80303



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nick Szumlas  
3201 44th Ave SW  
Seattle, Washington 98116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Luciano  
1830 8th St  
Columbia City, Oregon 97018

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Anderson  
6493 Edna Rd  
San Luis Obispo, California 93401

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Aerial Kruger  
1514 NW 52nd St  
Apt C4

Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah McNeal  
1929 Lansdale Dr  
Charlotte, North Carolina 28205

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Albright  
21613 Echo Lake Rd  
Snohomish, Washington 98296

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nicholas Curtright  
Anacortes, Washington 98221



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jack Harmell  
651 Ferry Rd  
Lopez, Washington 98261

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Pickering  
Vancouver, Washington 98682

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Janelle  
803 N Main St  
Walla Walla, Washington 99362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sylvia Rodriguez  
227 E 5th St  
New York, New York 10003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jane Miller  
465 Sandburn Ln  
Vienna, Illinois 62995

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeanne Poirier  
Po Box 228  
Cashmere, Washington 98815

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lindsey Heller  
20717 Hubbard Rd  
Lynnwood, Washington 98036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rich Hladky  
1102 Scott Ave  
Bremerton, Washington 98310



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lois Butterfield  
2514 SE 151st Ave  
Vancouver, Washington 98683

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Lang  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frank Stieber  
16270 12th Ave NE  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marcia Hoodwin  
Sarasota, Florida 34238

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David And Ann Cordero  
2814 Lilac St  
Longview, Washington 98632

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jean Avery  
13314 SE 19th St  
Vancouver, Washington 98683

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Graff  
2204 Westcourt Ln  
Los Angeles, California 90025

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lisa Canar  
Seattle, Washington 98103



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John P. Guros guros  
2644 S 226th St  
Seattle, Washington 98198

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Halloran  
2062 Scotsman Ln NE  
Salem, Oregon 97305

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tyrell Hedlund  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kimberly Teraberry  
532 18th Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Bernard  
56 Mildred St  
South Portland, Maine 4106

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Peha  
13313 Adair Creek Way NE  
Redmond, Washington 98053

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

william gorenfeld  
16 Gothic Dr  
Novato, California 94947

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Hodgin  
6524 26th Ave NE  
Seattle, Washington 98115



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joyce Grajczyk  
12026 SE 216th St  
Kent, Washington 98031

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Jo Wilkins  
315 W 50th Ave  
Kennewick, Washington 99337

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Norman Baker  
3789 Lost Mountain Rd  
Sequim, Washington 98382

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Bein  
2216 Overland Ave  
Los Angeles, California 90064

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Flank  
1413 NW 62nd St  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Edith Gish  
6043 S Oakes St  
Tacoma, Washington 98409

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Lindberg  
10903 NE 102nd St  
Vancouver, Washington 98662

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan Lee Schwartz  
1240 Sycamore Pl  
Longview, Washington 98632



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dianne Ensign  
11600 SW Lancaster Rd  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jack Burke  
15944 259th Ave SE  
Issaquah, Washington 98027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gina Pantier  
37632 26th Dr S  
Federal Way, Washington 98003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ruth Darden  
900 University St  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janice Hallman  
5355 Anderlie Ln  
Saint Paul, Minnesota 55110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Del E Domke  
16142 NE 15th St  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Trish Maharam  
194 36th Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Billie Abbott  
1530 Tamarack St  
Sweet Home, Oregon 97386



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Guila Muir  
3724 38th Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rita Heinz  
80 Nursery St  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anita Kiefer  
836 N Circle Dr  
Wapakoneta, Ohio 45895

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katherine Giseburt  
647 W Lake Sammamish Pkwy NE  
Bellevue, Washington 98008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jill James  
Portland, Oregon 97220

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alex Mach  
4035 32nd Ave SW  
Seattle, Washington 98126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Watts  
513 SE 27th Way  
Boynton Beach, Florida 33435

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ian McCluskey  
4024 NE 204th St  
Seattle, Washington 98155



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Porter  
8127 212th St SW  
Edmonds, Washington 98026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

philippe letourneau  
6227 34th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sarah Salter  
19432 71st Pl W  
Lynnwood, Washington 98036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristina Lamons  
1014 W 16th St  
Houston, Texas 77008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Kilgore  
510 Capitol Way N  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anna Humphreys  
6031 1st Ave NW  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ryan Nelson  
Colorado Springs, Colorado 80919

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dany Border  
13880 Kegley Rd NW  
Silverdale, Washington 98383



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Scott Davis  
106 State Route 197  
Fort Edward, New York 12828

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann El-Moslimany  
PO Box 367  
Seahurst , Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fred Greef  
1512 105th Ln SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Marx  
112 Lockerbie Pl  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Candace Bassat  
201 Neptune Ave  
Beachwood, New Jersey 8722

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robin Hordon  
27388 Woodside Rd NE  
Kingston, Washington 98346

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tpm Craighead  
Po Box 13213  
Burton, Washington 98013

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kirsten Randall  
5921 S J St  
Tacoma, Washington 98408



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Noemia Mlekarov  
2816 S Columbian Way  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Victoria Urias  
14001 35th Ave NE  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlotte Feck  
PO box 19  
301 10th Street #6

Plummer, Idaho 83851

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janice Wilfing  
167 Sunset Pl  
Sequim, Washington 98382

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joel Hildebrandt  
3044 Halcyon Ct  
Berkeley, California 94705

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Forrest Watkins  
1429 N 53rd St  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Olivier  
2825 SW 170th St  
Seattle, Washington 98166



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Megan Abramczyk  
4357 N Williams Ave  
Apt. 303

Portland, Oregon 97217

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gerald Hickman  
430 N 4th St  
Cheney, Washington 99004

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynn Noel  
P. O. Box 564  
Nine Mile Falls, Washington 99026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

FIRST LAST LSDT  
2102 Harrison Ave NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Slaton  
1110 NW Overlook Dr  
Vancouver, Washington 98665

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen Lang  
3810 NE 100th Ct  
Vancouver, Washington 98662

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Catherine Adams  
7903 8th Ave S  
Seattle, Washington 98108



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Betty Hauser  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynda Cunningham  
15558 26th Ave NE  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lisa Wright  
3614 Wetmore Ave  
Everett, Washington 98201

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Hartley  
1675 Saginaw St S  
Salem, Oregon 97302

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brie Gyncild  
1407 15th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barrie Gile  
1937 Edgefield Dr  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maria Gonzalez  
5117 N East River Rd  
Chicago, Illinois 60656

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lauren Thompson  
13229 Clairmont Way  
Oregon City, Oregon 97045



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Horman  
7116 Greenwood Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Brace  
36642 Little Sycamore St  
Palmdale, California 93552

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michelle Lesourd  
6854 18th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fritzi Cohen  
Ocean Park, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

george Gundersen  
9906 Hart Rd SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sergey Alekhovich  
333 Summit Ave E  
APT 201

Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bruce Cratty  
2525 S Humboldt St  
Denver, Colorado 80210



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Johnson  
6 Overlake Ct  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gordon Wood  
3807 S McClellan St  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wendy Feltham  
552 Cook Ave  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maria Batayola  
15353 SE 49th Pl  
Bellevue, Washington 98006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leonard Obert  
15426 SE 116th St  
Renton, Washington 98059

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Scott Species  
1922 9th Ave  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alan Kaptanoglu  
5756 25th Ave NE  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tim Yoder  
Seattle, Washington 98103



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Bernstein  
Portland, Oregon 97202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Ellison  
4303 NE 14th Ave  
Vancouver, Washington 98663

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

R. A. Larson  
109 S 27th  
Mount Vernon, Washington 98274

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Underwood  
1809 E 31st St  
Tacoma, Washington 98404

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lars Liden  
902 17th Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Gutierrez  
45825 Abronia Trl  
Palm Desert, California 92260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Liz Campbell  
605 N 64th St  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharron Coontz  
3716 NW 85th Ave  
Olympia, Washington 98502



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virginia Linstrom  
2420 Marina Ln SE  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tarun Bishop  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tonya Stiffler  
18051 Sunnyside Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Rauworth  
532 SE 15th Ave  
Portland, Oregon 97214

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Erb  
1068 Park Ave NE  
#304

Salem, Oregon 97301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeffrey West  
15695 Morningside Dr  
Guerneville, California 95446

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Boguske  
8500 148th Ave NE  
Redmond, Washington 98052



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Randall Webb  
2328 NW Glisan St  
Portland, Oregon 97210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Hepfer  
1720 E John St  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ellen Wood  
18803 Densmore Ave N  
Shoreline, WA

Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charlene Lauzon  
5715 202nd St SW  
Lynnwood, Washington 98036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Scavezze  
3008 Amhurst Ct SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Wasserman  
1510 N Steele St  
Tacoma, Washington 98406

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Craig Jacobrown  
8161 Midway Ave  
Indianola, Washington 98342



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Georgia Locker  
713 Duke Sq  
Fort Collins, Colorado 80525

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen Canny  
7848 58th Ave NE  
Olympia, Washington 98516

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Haeder  
PO Box 2334  
Waldport, Oregon 97394

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amanda Karim  
16916 NE 97th St  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mike Nuess  
2025 E 10th Ave  
Spokane, Washington 99202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathleen Patton  
1644 24th Ave  
Longview, Washington 98632

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Golding  
515 Foote St SW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amy Hansen  
8 Deboer Farm Ln  
Asbury, New Jersey 8802



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sammy Low  
709 W Wiser Lake Rd  
Stanwood, Washington 98292

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Daviann Mcclurg  
621 Morris Ave  
Larned, Kansas 67550

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joseph Poirier  
1611 1st Ave W  
Apt 3

Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michele McFerran  
1508 Cedar St  
Lake Oswego, Oregon 97034

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deanna Vandiver  
8625 Springridge Rd NE  
Bainbridge Island, Washington 98110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Kibble  
6833 48th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Warren  
210 E Flamingo Rd  
Sandpoint, Idaho 83864



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharon Douglass  
129 E 4th St  
New York, New York 10003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Townsend  
623 NE Morris St  
Portland, Oregon 97212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Reid  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kevin Hughes  
1206 11th St  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Tuminski  
47 Hidden Brook Dr  
Stamford, Connecticut 6907

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Blair Kangley  
2531 W Dravus St  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Davis  
Hoquiam, Washington 98550

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maren Kentfield  
223 S Fresno Spring Way  
Tucson, Arizona 85748



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Arlene Baker  
2324 Blake St  
Berkeley, California 94704

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katarina Terning  
Bergsg 13  
Stockholm, New York 11737

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gina Bates  
40 South St  
Apple Creek, Ohio 44606

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Alskog  
Honolulu, Hawaii 96822

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harold Treinen  
2212 SE 26th Ave  
Portland, Oregon 97214

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

T Malchow  
Ronan, Montana 59864

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

STiart Blum  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shawn O'grady  
Arlington, Washington 98223



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joyce Weir  
Newport, Washington 99156

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Josette Gates  
909 S Azalea Dr  
spokane, wa

Spokane, Washington 99224

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Virgene Link-New  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Charles Totten  
PO Box 2  
Winlock, Washington 98596

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Schleyer  
303 Wilson St NE  
Olympia, Washington 98506

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Ruthholder  
Vancouver, Washington 98664

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Schwab  
9142 N Mercer Way  
9142 N. Mercer Way, Apt. 7203



Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Linn  
918 Hassalo Ave SE  
Ocean Shores, Washington 98569

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cathleen McConnell  
7001 S Clement Ave  
Tacoma, Washington 98409

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

June MacArthur  
1045 Hillandale Dr E  
Port Orchard, Washington 98366

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lane Hatfield  
2647 10th Ct SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Magaly Fernandez  
1799 Revere Ave  
San Francisco, California 94124

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dolores Darst  
343 Cedar Prk Dr  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Osborn  
2802 Pacific Ave  
Hoquiam, Washington 98550



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rayna Holtz  
12509 SW Cove Rd  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anand Naik  
15429 SE 21st Pl  
Bellevue, Washington 98007

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Inge Dalland  
16020 9th Ave SW  
Seattle, Washington 98166

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matt Weatherford  
2312 NE 113th St  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Evelyn Verrill  
1155 Fawn Ln  
Prescott, Arizona 86305

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

J. Barry Gurdin  
247 Ortega St  
San Francisco, California 94116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Valerie Costa  
2428 E Roy St  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carlo Voli  
Edmonds, Washington



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wayne Kelly  
258 A St  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shane Yellin  
4517 Cove Dr  
Carlsbad, California 92008

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bea Kumasaka  
2030 Western Ave  
Seattle, Washington 98121

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Newmann, M.D.  
2005 Water St SW  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Loretta Sylvestre  
5933 Merlot Ln SE  
Olympia, Washington 98513

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dahlia Wisner  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

P Perron  
Seaview Avenue Northwest  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Amber Cadenas  
Bellingham, Washington 98226



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rik Anderson  
6489 SE Cougar Mountain Way  
Bellevue, Washington 98006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Dayton  
Vancouver, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Crystal Gartner  
6053 Atlas PI SW  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lee Hawkins  
12121 Admiralty Way  
Everett, Washington 98204

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Heather Jackson  
1333 Oceano Dr  
Grayland, Washington 98547

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Jokela  
Deer Park, Washington 99006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rev. Randall (Randy) Henderson  
8223 Mossy Rock Ave NE  
Olympia, Washington 98516

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kirk Kirkland  
3114 N Alder  
Tacoma, Washington 98407



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Francis Mastri  
87 Jones St  
West Haven, Connecticut 6516

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Glenn Hufnagel  
1174 Kensington  
Buffalo, New York 14215

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Denise McAllister  
14300 SE 171st Way  
Apt. F6

Renton, Washington 98058

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jill And Barbara Yetter  
10586 Ne Kingston Meadow Circl  
Seattle, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joana Kirchhoff  
3414 NE 73rd Ave  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Carroll  
390 Audubon St  
New Orleans, Louisiana 70118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharon Anderson  
1920 NW Mulholland Blvd  
Poulsbo, Washington 98370



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eleanor Dowson  
2007 Mill Pointe Dr SE  
Bothell, Washington 98012

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Lamb  
5017 S Cedar Acres Ln  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wally Bubelis  
5432 45th Ave SW  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marjorie Ostle  
8214 126th Ave NE  
Kirkland, Washington 98033

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bridgid Persephone Newman-Henson  
6321 Corgiat Dr S  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maradel Gale  
239 Parfitt Way SW  
Bainbridge Island, Washington 98110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chris Guillory  
420 S Laurel St  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jackie Cole  
13527 Avondale Rd NE  
Woodinville, Washington 98072



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vincent Ho  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Liisa Kellems  
2202 29th Ct NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tia Pearson  
P.O.Box 861697  
Wahiawa, Hawaii 96786

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Blumenthal  
2812 NE 62nd St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Verzosa  
7913 Tangerine Dr  
Tampa, Florida 33637

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maureen Traxler  
2020 NW 195th St  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Bisset  
7201 125th Ave SE  
Renton, Washington 98056

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sally Stroud  
7119 80th Ave SE  
Mercer Island, Washington 98040



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Francis Lenski  
921 NW 115th Cir  
Vancouver, Washington 98685

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Heather Ogilvy  
208 5th St  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Adele Reynolds  
900 University St  
Seattle, Washington 98101

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Carbonneau  
4500 Palatine Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Mensinger  
PO Box 329  
Grapeview, Washington 98546

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tina Mckim  
2333 Humboldt St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Camryn Pate  
2567 Hunter Rd  
Clinton, North Carolina 28328

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jacqueline Thompson  
9050 Avondale Rd NE  
Redmond, Washington 98052



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leland Block  
3565 NE Mathison Pl  
Portland, Oregon 97212

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janette Dean  
103 N Gjere Ave  
Townhouse #5

Caledonia, Minnesota 55921

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Greg And Rebecca Durr  
2703 Riverview Dr  
Aberdeen, Washington 98520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Eichner  
3412 11th Ave W  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steven Schafer  
Po Box 432  
Beaverton, Oregon 97075

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joyce Heyn  
13427 Little Dawn Ln  
Poway, California 92064

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Aerial Kruger  
1514 NW 52nd St  
Apt C4



Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jessica Holmes  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Merrill  
10630 Culpeper Ct NW  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Derek Benedict  
709 212th PI SW  
Lynnwood, Washington 98036

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Toni Syring  
17655 Bluff Rd  
Sandy, Oregon 97055

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tyra Pellerin  
New Orleans, Louisiana 70122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Hart  
11 th ave  
Oak Harbor, Washington 98277

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Benita Moore  
48 Green Hill Rd  
Bellingham, Washington 98229



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

MARY LOU ZEIS  
8691 Park Dr  
Hamburg, New York 14075

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tabitha Thomasson  
25 Parsons Pl  
Dahlonega, Georgia 30533

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dale Riehart  
86 South Park  
San Francisco, California 94107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Curtis Cawley  
3630 22nd Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jordan Van Voast  
2109 31st Ave S  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca Canright  
11589 Martin Rd  
Rockport, Washington 98283

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Neal Umphred  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Erline Towner  
49 Quarry Cir  
Milford, New Hampshire 3055



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Christopher Buckley  
6568 32nd Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steven Gary  
5124 S Graham St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pamela Scott  
167 Teilh Dr  
Boulder Creek, California 95006

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Meryle A. Korn  
2821 Huron St  
Bellingham, Washington 98226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ann Kittredge  
P.O. Box 763  
Quilcene, Washington 98376

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Margie Heller  
Cheney, Washington 99004

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Klaudia Englund  
7630 Cypress Way  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Esther Friedman  
4160 Hertel Dr S  
Salem, Oregon 97302



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carla Carroll  
1551 NW 195th St  
Seattle, Washington 98177

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

a w  
2330 43rd Ave E  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John P. Guros guros  
2644 S 226th St  
Seattle, Washington 98198

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nancy Ellingham  
9106 Fortuna Dr  
Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Deborah Mangold  
3920 S J St  
Tacoma, Washington 98418

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Doering  
1544 Polk St  
San Francisco, California 94109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tracy Ouellette  
14078 Mactaggart Ave  
Bow, Washington 98232

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Suzanne Zook  
P.O Box 601  
Cave Junction, Oregon 97523



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jill Reifschneider  
14846 74th PI NE  
Kenmore, Washington 98028

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alan Papscon  
40 Glendale Rd  
Stockbridge, Massachusetts 1262

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Nicholas Heyer  
5102 S Adams St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James VanderWeele  
3035 124th Ave NE  
Bellevue, Washington 98005

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Julie Glover  
7292 Maxwellton Rd  
Clinton, Washington 98236

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Vicki Halbakken  
633 Edgecliff Dr  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teresa Allen  
6184 N Fork Rd  
Deming, Washington 98244

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joyce Sherman  
15938 NE Fremont St  
Portland, Oregon 97230



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Stephen Rosenblum  
210 Santa Rita Ave  
Palo Alto, California 94301

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Pan  
9466 Deramus Farm Ct  
Vienna, Virginia 22182

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diana Talcott  
2806 SE 15th Ave  
Portland, Oregon 97202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Georgina Wright  
4370 New Suffolk St  
North Las Vegas, Nevada 89030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Muirhead  
6756 39th Ave SW  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

terri sommer  
802 Walnut Ave  
Woodward, Iowa 50276

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pat Kreiborg  
9103 NE 54th St  
Vancouver, Washington 98662

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elliott Bales  
Park City, Tennessee 37344



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Leah Eister-Hargrave  
2622 3rd Ave N  
Seattle, Washington 98109

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Horn  
Seattle, Washington 98119

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sigrid Llewellyn  
100 Timber Ridge Way NW  
Issaquah, Washington 98027

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Craig Heverly  
4216 SE Steele St  
Portland, Oregon 97206

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jared Howe  
4107 Martin Luther King Jr Way S  
Seattle, Washington 98108

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Smith  
11700 Sand Point Way NE  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve V.  
323 E 2nd St  
Port Angeles, Washington 98362

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elaine Benjamin  
2627 Eltinge Dr  
Alpine, California 91901



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shannon Stephens  
2709 NE 145th St  
Seattle, Washington 98155

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eva Lazarus  
302 SE 105th Ave  
Portland, Oregon 97216

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Lucas  
2706 Del Curto Rd  
Austin, Texas 78704

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Ann Jasper  
3612 SE 28th Pl  
Portland, Oregon 97202

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tui Mullein  
4830 S Lucile St  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Anne Hall  
1226 Lopez Rd  
Lopez, Washington 98261

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Angeline Johnson  
PO Box 17932  
Seattle, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dell Goldsmith  
7150 SW Newton Pl  
Portland, Oregon 97225



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Pamela Coker  
1505 E 12th St  
Pueblo, Colorado 81001

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marts Peterson  
311 Pocket  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Scheelen  
123 Sunrise Ave  
Medford, Oregon 97504

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Wayne Wathen  
6426 Silver Mesa Dr  
Littleton, Colorado 80130

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

David Scheer  
2715 Cody Cir  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cathleen Burns  
PO Box 2934  
Friday Harbor, Washington 98250

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brian Durham  
Nine Mile Falls, Washington 99026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Rice  
4552 E Mercer Way  
Mercer Island, Washington 98040



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Caryl Utigard  
2447 SW 170th St  
Seattle, Washington 98166

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Sather  
, Washington

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Haines  
6000 Kc PI SE  
Port Orchard, Washington 98366

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Graham Hubenthal  
Stanwood, Washington 98292

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

michael rosen  
5980 SE 30th St  
Mercer Island, Washington 98040

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jessica Espy  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Hanks  
, Oregon

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Chasity Hungerford  
9525 NE 140th St  
Kirkland, Washington 98034



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lester Thompson  
2009 30th Ave W  
Seattle, Washington 98199

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Denise Lytle  
73 Poplar St  
FORDS, New Jersey 8863

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl-Ann Weekes  
82 Woolson St  
MATTAPAN, Massachusetts 2126

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

William Copeland  
Lacey, Washington 98503

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claire Alkire  
101 Choice Lp  
Sequim, Washington 98382

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Aleks Kosowicz  
N. Balsam Road  
Hayward, Wisconsin 54843

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kay Brainerd  
19901 Martinsville Rd  
Belleville, Michigan 48111

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marcus Lanskey  
5722 E Collins Rd  
Port Orchard, Washington 98366



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gloria McClintock  
1411 Northview Ct  
Mount Vernon, Washington 98274

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Monica Montgomery  
Poulsbo, Washington 98370

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patricia Coffey  
2253 Woodbine Rd  
Langley, Washington 98260

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

E. Neal  
56 Alexandra Way  
Cape May Court House, New Jersey 8210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Peter Beves  
26 Bathrick Rd  
Westminster, Massachusetts 1473

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fran Koehler  
6225 Palatine Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tyler Kipling  
3206 64th Ave SW  
Seattle, Washington 98116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorie Lucky  
916 17th Ave  
Seattle, Washington 98122



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lorraine Hersey  
4223 SW Broadlane Ave  
Pendleton, Oregon 97801

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Paul Zurfluh  
2734 Locust Ave W  
Tacoma, Washington 98466

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

MaryAnn Seward  
2360 Haines  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kim Thomas  
4227 Midvale Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Christina Dubois  
Burton, Washington 98013

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helen Jones  
264 Grant St  
Ashland, Oregon 97520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kelsey Oxford  
10503 Aqueduct Dr E  
Tacoma, Washington 98445

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jack Leiman  
2116 50th St NW  
Gig Harbor, Washington 98335



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helgaleena Healingline  
Box 6121  
Monona, Wisconsin 53716

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jonathan Boyne  
Kakela Drive  
Honolulu, Hawaii 96822

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

ElsaMarie Butler  
200 High School Rd NE  
Bainbridge Island, Washington 98110

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Richard Meeks  
Ballard  
Seattle, Washington 98107

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Priscilla Martinez  
12704 NE 200th Pl  
Bothell, Washington 98011

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kate Kourbatova  
Kent, Washington 98030

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Daligcon  
16231 21st Ave SW  
Burien, WA

Seattle, Washington 98166



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sue Van Loon  
5441 SW Nebraska St  
Portland, Oregon 97221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Robert Bulanda  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marius Wasbauer  
P. O. Box 69820  
Brookings, Oregon 97415

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elizabeth Garratt  
SAINT AUGUSTINE, Florida 32086

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Doyle  
1608 NE 73rd St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joana Kirchhoff  
3414 NE 73rd Ave  
Portland, Oregon 97213

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Harris Dunkelberger  
195 Bolster Rd  
Oroville, Washington 98844

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kimberly Crane  
2801 Bickford Ave  
Snohomish, Washington 98290



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Maghakian  
175 Ridgeview Terrace  
Bellingham, Washington 98226

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Yonit Yogev  
821 Kaiser Rd NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lynn Shoemaker  
172 N Esterly Ave  
Whitewater, Wisconsin 53190

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

karen fisher  
2575 Mountain View Rd  
Ferndale, Washington 98248

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joanne Wright  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rhett Gambol  
318 10th Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marcy Crane  
2902 W Gelding Dr  
Phoenix, Arizona 85053

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brian Kelly  
Horsham, Pennsylvania 19044



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Hatcher  
116 Connifer Trl  
Bumpus Mills, Tennessee 37028

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Havekotte  
26117 97th Ave SW  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Sword  
2701 Landes  
Port Townsend, Washington 98368

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Shurgot  
6536 31st Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Timothy Manns  
1220 S 11th St  
Mount Vernon, Washington 98274

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dolly And Roy Sutherland  
Tacoma, Washington 98466

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Catherine Martinez  
24382 Catamount Ln NW  
Poulsbo, Washington 98370

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phillip Hope  
248 10th St  
Brooklyn, New York 11215



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Raymond Marshall  
20635 Spring Garden Rd  
Foresthill, California 95631

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Perkins  
13226 42nd Ave NE  
Seattle, Washington 98125

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marya Bradley  
11 Prices Ln  
Media, Pennsylvania 19063

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeanene Lorey  
1831 Atlas Rd  
Bothell, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Cohen  
1608 E Republican St  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Merna Blagg  
1410 Z St  
Vancouver, Washington 98661

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Betz  
2630 Franklin St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Suzanne Scollon  
PO Box 913  
Freeland, Washington 0



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Studley  
4610 135th St NE  
Marysville, Washington 98271

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carole L Burger  
21428 86th Ave SW  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

gretchen carlson  
1300 114th Ave SE  
#102

Bellevue, Washington 98004

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

E Ellis  
Aberdeen, Washington 98520

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Teresa Iovino  
4669 Dunn Ave  
Memphis, Tennessee 38117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Georgann Falotico  
6598 NE Cedar St  
Suquamish, Washington 98392

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jeffrey Panciera  
3636 S Orcas St  
Seattle, Washington 98118



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Holger Mathews  
3100 Airport Way S  
Seattle, Washington 98134

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Alicia Liang  
184 Wynne St  
Pittsburgh, Pennsylvania 15209

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Warren Sheay  
1453 Humboldt St  
Bellingham, Washington 98225

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brenda Bailey  
PO Box 656  
Eastsound, Washington 98245

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Andrea Faste  
7713 11th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Anderson  
13522 Densmore Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Regan  
5413 N Cloquet Rd  
Duluth, Minnesota 55810

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Valentina Warner  
3273 McClintock Ave S  
Seattle, Washington 98144



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jonel Stahr  
2727 Fairview Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Janet Johnson  
556 NE 20th Pl  
Newport, Oregon 97365

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Derek Gendvil  
9030 W Sahara Ave  
Las Vegas, Nevada 89117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sandra Joos  
4259 SW Patrick Pl  
Portland, Oregon 97239

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cheryl Christy  
376 Seaburn St  
Brookfield, Ohio 44403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dan Schneider  
814 NE 84th St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Zack  
Ridgedale Dr. N.  
Worthington, Ohio 43085

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Francisco J. Velez  
824 Palmer Rd  
Bronxville, New York 10708



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Way  
13120 SW 248th St  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lee Schmidt  
1926 SW Vermont St  
Portland, Oregon 97219

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Henry Matthews  
1437 20th Ave  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Bradley Barton  
5910 147th St SW  
Edmonds, Washington 98026

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susan MacGregor  
16911 NE 95th St  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

KC Young  
2037 S 301st Pl  
Federal Way, Washington 98003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Karen Mitchell  
1700 24th Ct  
Anacortes, Washington 98221

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Linda Gillaspy  
9155 Wigwam Way  
Reno, Nevada 89506



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Monika Holm  
215 10th Ave E  
Seattle, Washington 98102

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Diane Emerson  
PO Box 2315  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rebecca Reynolds  
402 B Metuchen Dr  
Jamesburg, New Jersey 8831

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Frank Erickson, M.D.  
109 NE Ellis Ave  
Pendleton, Oregon 97801

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kathleen Hendrickson  
PO Box 1433  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Erica Bieber  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tom Harris  
Bordentown, New Jersey 8505

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Eric Wollscheid  
700 Longview Dr  
La Grange, Illinois 60525



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Matthew Johnson  
PO Box 30553  
Bellingham, Washington 0

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Michael Bailey  
2100 S Main St  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Travis Miller  
3114 E Pine St  
Seattle, Washington 98122

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gary Jacobson  
1402 Whatcom St  
Bellingham, Washington 98229

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cindy Jensen  
27997 NW Dorland Rd  
North Plains, Oregon 97133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Arnold Strang  
23607 47th Pl. W.  
Mountlake Terrace, Washington 98043

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elsy Shallman  
Loxahatchee, Florida 33470

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carrie Darling  
18032 N 2nd St  
Phoenix, Arizona 85022



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marian Cruz  
1765 Shuey Ave  
Walnut Creek, California 94596

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Martin J. Velez  
6118 NE 32nd Ave  
Portland, Oregon 97211

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Coffee  
2124 NE Park Rd  
Seattle, Washington 98105

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Caroline Kane  
10 Oak Ln  
Verona, New Jersey 7044

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

John Williams  
8708 SW 184th St  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James French  
9233 Interlake Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Kristin Felix  
5703 51st Ave NW  
Olympia, Washington 98502

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Lea Ann Rolla  
7717 Interurban Blvd  
Snohomish, Washington 98296



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mike Dahlstrom  
11018 33rd Dr SE  
Everett, Washington 98208

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Zoe Spiropoulou  
Manis 7  
Haines Falls, New York 12436

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marina Ruiz  
4245 NE 88th St  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Joanna Chesnut  
5020 116th St E  
Tacoma, Washington 98446

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Rosalie Sable  
885 Mindy Sue  
Medford, Oregon 97501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phillip Hope  
248 10th St  
Brooklyn, New York 11215

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jennifer Calvert  
Blaine, Washington 98230

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Judith Lienhard  
4455 SW 94th Ave  
Portland, Oregon 97225



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Athena Bautista  
5954 Beach Dr SW  
Seattle, Washington 98136

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Bengtsson  
7801 Greenwood Ave N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

RoseMary Lary  
305 W Harding Ave  
Greenwood, Mississippi 38930

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sharon Miller  
1501 NE 89th Ct  
Vancouver, Washington 98664

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Phil Goldsmith  
2420 NW Marshall St  
Portland, Oregon 97210

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Avery Stemen  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Susanne Weil  
Po Box 787  
Onalaska, Washington 98570

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tiffany Rapplean  
4528 W 110th Cir  
Westminster, Colorado 80031



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dennis Smith  
505 W Main St  
Enterprise, Oregon 97828

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Tahoma Wrubleski  
242 Raven Hill Rd  
Lopez, Washington 98261

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Candace Laporte  
4203 Alabama Ct  
Silverdale, Washington 98315

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Jayne Cerny  
Po Box 241  
Inverness, California 94937

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Melvin Mackey  
24430 Old Mill Rd SW  
Vashon, Washington 98070

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Elyette Weinstein  
5000 Orvas Ct SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Adam Levine  
1819 E Republican St  
Seattle, Washington 98112

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Ian Shelley  
50 SW 97th Ave  
Portland, Oregon 97225



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Hoa P  
23210 114th Way SE  
Kent, Washington 98031

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Maria Nowicki  
2324 14th Ave  
San Francisco, California 94116

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Angela Kelly  
1817 Adams St SE  
Olympia, Washington 98501

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gene Ulmer  
1408 E 5935 S  
Salt Lake City, Utah 84121

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Phinney  
12248 Phinney Ave N  
Seattle, Washington 98133

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

James Mulcare  
1110 Benjamin St  
Clarkston, Washington 99403

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Mary Jo Coblentz  
1607 Johnston Ave  
Richland, Washington 99354

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Claudia Eberly  
21815 38th Dr SE  
Bothell, Washington 98021



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Laura Gibbons  
5021 43rd Ave S  
Seattle, Washington 98118

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Dean Sigler  
18845 SW Vista St  
Hillsboro, Oregon 97003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Sybillie Vital  
206 Easy St  
Rainier, Washington 98576

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Cil Pierce  
6823 30th Ave NE  
Seattle, Washington 98115

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Barbara Manildi  
3525 Red Cedar Way  
Lake Oswego, Oregon 97035

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Donald Paden  
665 Cressa Dr  
Loveland, Colorado 80537

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Thomas Pollock  
2421 SW Trenton St  
Seattle, Washington 98106

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Carol Johnson  
9456 W Wagon Trail Cir  
Littleton, Colorado 80123



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Emily Willoughby  
17000 53rd Ave S  
Seattle, Washington 98188

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Shanti Volkmann  
Seattle, Washington 98144

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brandie Deal  
15836 NE Leary Way  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Brian Larson  
6553 25th Ave NW  
Seattle, Washington 98117

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Fred Campbell  
3822 Ashworth PI N  
Seattle, Washington 98103

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Gina Pantier  
37632 26th Dr S  
Federal Way, Washington 98003

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Patti Herring  
7048 S Blue Creek Rd  
Evergreen, Colorado 80439

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Katherine Wright  
4 Titian  
Aliso Viejo, California 92656



October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Helen Stuehler  
12777 Red Rock Rd  
Reno, Nevada 89508

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Steve Thompson  
9050 Avondale Rd NE  
Redmond, Washington 98052

October 4, 2019

Sonja Larson, Rulemaking Lead  
Spills Program, Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504

RE: Comments on Washington State Oil Spill Contingency Plan Rule Update Chapter 173-182  
WAC

Dear Ms. Larson,

I am concerned about the risks that tar sands crude oil poses to my community and communities across Washington State. I appreciate the work that the Department of Ecology has done thus far to improve oil spill prevention, preparedness, and response measures over the last several years, but am concerned that the proposed updates to Washington's Oil Spill Contingency Plan Rule does not go far enough to protect us from a worst case scenario spill of tar sands crude oil.

Communities across Washington are already at risk from the existing transport of tar sands crude oil and we unprepared to respond. Currently tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound, and through the Puget Sound Pipeline across Whatcom and Skagit Counties. The proposed expansion of the Canadian Trans Mountain Pipeline would exacerbate these existing risks and increase the likelihood of a catastrophic oil spill of diluted bitumen. In addition to being one of the most climate-polluting fossil fuels on the planet, heavy tar sands crude oil sinks when spilled into the water and is virtually impossible to clean up, causing irreparable damage to our economy, communities, and endangered orcas and vulnerable ecosystems.

To address these risks, Ecology should require a fast, aggressive, and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink. The timeframes required in the draft rule provide no assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen, which is likely to sink quickly and therefore demands more stringent equipment and response time requirements.

Finally, I urge Ecology to enhance planning standards for wildlife response in the event of an oil spill. It is essential that wildlife response actions are initiated as soon as possible with adequate personnel and equipment. Deterrence actions that keep wildlife from entering a spill must be underway immediately after a spill. The Plan must require that the monitoring and deterrence operations apply to all killer whales. This will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill. I urge Ecology to exercise its full regulatory authority and establish stronger protections from tar sands oil that Washington needs and deserves.

Sincerely,

Marge Schwartz  
Po Box 21955  
Santa Barbara, California 93121

