

## Marco de la Rosa

As a Washington State resident, I am VERY concerned about the risks that tar sands TOXIC crude oil poses to my community and communities across the State.

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

Communities across Washington State are already AT RISK from the existing transport of tar sands crude oil and we UN-prepared to respond.

Currently EXPLOSIVE and TOXIC tar sands are transported by rail through Eastern Washington and along the Columbia River, by barge across Puget Sound and through the Puget Sound Pipeline across Whatcom and Skagit Counties.

Proposed expansion of the Canadian Trans Mountain Pipeline would greatly INCREASE these existing risks and increase chances of a CATASTROPHIC oil spill of diluted bitumen.

In addition to being one of the WORST climate-polluting fossil fuels on the planet, heavy tar sands crude oil SNKS when spilled into the water and is virtually IMPOSSIBLE to clean up, causing irreparable damage to our economy, communities, endangered Orcas and vulnerable eco-systems.

To address these risks, Ecology should require a FAST, aggressive and well-coordinated response to contain and recover potentially non-floating oils before they submerge and sink.

The time frames required in the draft rule provide ZERO assurance that the current response times and capability will be sufficient to respond to a worst-case spill. Ecology should distinguish between all potentially non-floating oils and diluted bitumen ( more likely to sink quickly and demand more stringent equipment and response time requirements ).

Finally, I urge Ecology to IMPROVE planning standards for wildlife response in the event of oil spills. It is ESSENTIAL that wildlife response actions are initiated as soon as possible with adequate personnel and equipment.

Deterrence actions that keep wildlife from entering spill sites MUST be underway immediately after a spill. The Plan must require that monitoring and deterrence operations apply to all Orcas / killer whales. That will provide greater certainty that Southern Resident orcas will be deterred from entering an oil spill.

I urge Ecology to exercise FULL regula-tory authority and establish stronger protections from TOXIC tar sands oil that Washington State needs and deserves.