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Improving oil spill response time is the most important tactic to limit the impacts of a nonfloating oil spill.

Washington's oil spill response program has not kept up with the latest science associated with realistically calculating oil spill response effectiveness as well as the growing and changing risks nonfloating oils pose to our region.

Additional equipment and personnel must be prepared to be deployed more quickly to contain and collect the spill of nonfloating oil — before it begins to submerge and sink. Ecology must act now to establish the strongest possible protection from spills of nonfloating oils. This can only occur if Ecology uses a more robust, quantitative and realistic methodology to evaluate oil spill response capabilities.

Additional coordination and preparedness for dealing with spills of potentially non-floating oils reduce the likelihood that oils will weather and sink before they are addressed. Improved preparedness for potentially sinking oils could have helped reduce damages and ultimate cleanup costs from the Enbridge Kalamazoo spill that cost \$1.2 billion to clean up.

The nonfloating Canadian Tar Sands crude oils should be regulated commensurate with their unique risks and spill response challenges. The draft update requires additional but unquantified resources and equipment to detect, contain and collect nonfloating oils to arrive within 6-12 and 12-24 hours. These timeframes are not soon enough and the draft update provides no assurance that the amount and type of resources and equipment will be sufficient to respond to a worst-case spill.

Additional requirements for respiratory protection as well as air quality monitoring need to be established to protect oil spill responders. There should also be requirements for notifying shoreline residents and businesses and providing public health and safety in the early hours of an oil spill.

Wildlife response operations require additional detail and capacity.

The wildlife response operations need to include pre-emptive capture and relocation as well as the removal of oiled wildlife carcasses in addition to the identified operations of impact assessment, reconnaissance, deterrence, capture, stabilization, and rehabilitation. Updates to the wildlife response sections also need to specifically address response operations for the water column and benthic species that could be impacted by a nonfloating oil spill.

It is essential that wildlife response actions are initiated as soon as possible. In particular, deterrence actions that keep wildlife from entering a spill are critical to have underway immediately following a spill.

In addition, the draft update doesn't fully address the water column and benthic species that could be adversely impacted by a nonfloating oil spill.

The 2015 San Juan County Oil Spill Response Capacity Evaluation includes important findings and recommendations that address deficiencies on the current oil spill contingency plan. These recommendations should have been included in this update, or at the very least, thoroughly considered.

The San Juan Islands require heightened oil spill response capacity.

The San Juan Islands provide critical habitat for forage fish, salmon, and Southern Resident Killer Whales and are surrounded by major shipping lanes that transit narrow channels and navigational challenges such as Turn Point, all of which are in close proximity to shoreline residences and businesses. The increase in tanker traffic transporting nonfloating oils increases the risk of nonfloating oil spills. Oil spill response operations would be especially challenging given the swift currents and depths of the waterways. The importance of early and aggressive containment and collection of nonfloating oil spills and effective wildlife deterrence operations are especially significant in this biologically rich oasis of the State.