

## Mary Ferm

Improving oil spill response is the most important strategy in limiting impacts of a non-floating spill, however, Washington State's oil spill response has not kept up with the latest science. More equipment and personnel must be ready to quickly respond before non-floating oil begins to submerge and sink. Ecology needs a more robust and realistic method for evaluating oil spill response abilities. Improved response to non-floating oil spills would have drastically reduced cost for the Enbridge Kalamazoo cleanup. The table in WAC 173-182-324(2) needs to be updated to accelerate time-frames and needs to include details on the resources and equipment needed to respond to worst-case scenario of non-floating oil. Canadian Tar Sands crude oil needs to be regulated in a way that can deal with their unique risks and cleanup challenges. The draft update does not quantify additional resources, and the time frames given are not soon enough to deal with these non-floating oils. WAC 173-182-030 (48) requires that sufficient resources and equipment be available to respond to a worst-case spill.