

Victoria Leistman

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Hello. My name is Victoria Leistman. I'm a field organizer on the Dirty Fuels campaign with the Sierra Club and we're also a member of the Stand Up to Oil coalition. I don't have very much to add that a lot of my colleagues haven't already stated, but I would like to say that Sierra Club agrees that the draft rule is right to require a faster time frame for the initial assessment of a spill, however, the rule provides no assurance that the current response times and capability will be sufficient to respond to a worse case spill.

So we do not think that this rule goes far enough just to echo what my colleague, Anna, was just saying. This rule doesn't protect our fresh water and marine ecosystems and shoreline communities because it uses those outdated models to overestimate our response capacity and delaying needed improvements. And especially, you know, Sierra Club is particularly concerned about the Transmountain pipeline expansion project. The Puget Sound pipeline already feeds our Washington state refineries, and, of course, there is already that tar-sands risk as is, but with the looming increase potential for 700% more tankers moving through the really narrow areas of the San Juan Islands and the northern Salish Sea and down to the southern Salish Sea and down to what's currently happening -- being fed into Tacoma. And we cannot wait until 2021 or after to expand this rulemaking. And I agree that we would like a further commitment than just what an exploratory rulemaking looks like, but that this will be updated before the next five-year requirement. And I also just want to echo that we really appreciate all of the work that has been done so far and that there is a recognition that sinking tar-sands are a huge threat and that we need to be doing everything that we can to evaluate what a worst-case scenario looks like in all those different models. So thank you so much for your time.