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Protecting the environment is my top priority. I am concerned very about the risks that tar sands crude oil poses to my Puget Sound community here in western Washington.

The proposed updates to Washingtons Oil Spill Contingency Plan Rule are insufficient. They do not protect our environment from the very real threat of tar sands crude oil spills - and that would be devastating here.

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

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

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

I hope for more protection for our fragile natural environment. Thank you for the opportunity to comment.