



## King County

**Dow Constantine**

King County Executive

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[www.kingcounty.gov](http://www.kingcounty.gov)

December 10, 2020

Wendy Buffett

Department of Ecology, Spills Program

PO Box 47600

Olympia, WA 98504-7600

Re: Central Puget Sound Geographic Response Plan (GRP)

Dear Ms. Buffet:

I am deeply concerned about the risks to public safety, health, environment, and economy from the threat of oil spills in our marine waters and appreciate the opportunity to comment on the Central Puget Sound Geographic Response Plan. King County has a long track record of working regionally with state, local, and Tribal leaders to protect the health, safety, and environment of our communities from the risks of oil transportation by vessel, rail, and pipeline. I have weighed in previously in support of strengthening state requirements and plans for oil transport and spill response across the Salish Sea.

Fossil fuel transport, storage, and refining have ongoing environmental impacts from vessel noise, vessel traffic, and air and water pollution, and pose catastrophic risks from oil spills. King County is doing all it can locally to reduce these risks, and recently adopted a suite of policies and development regulations as part of its 2020 Comprehensive Plan update. The provisions focus on construction and operational impacts including public health and safety, local air and water quality, emergency management, and environmental justice. King County is also strengthening and accelerating investments in clean water and healthy habitat through its land conservation, salmon recovery, wastewater treatment, stormwater, fish passage and climate change programs. Southern Resident Orca and native salmon populations are on the brink; a catastrophic oil spill in Central Puget Sound could wipe out our efforts to recover these populations.

We believe that the Central Puget Sound Geographic Response Plan update needs to include the following:

### Priority areas

We have concerns about the booming maps. Most of the sensitive areas identified for booming are estuaries and pocket estuaries because it is a feasible response in those places. However, it is unrealistic to assume that the entire Vashon shoreline could be boomed or skimmed and many of those beaches are absolutely vital to Puget Sound herring. I would like to see more recognition that stretches of some beaches are especially high value and a significant spill on these known spawning grounds could be population threatening. This could help prioritize stretches with the highest ecological values for booming or skimming defenses.

### Consideration of natural disasters

The plan should include consideration of the compounding effect of a large spill following a major earthquake. Risk analyses show that transportation networks would be damaged or destroyed and other response capabilities would be overwhelmed. It would likely be impossible to conduct effective response and cleanup operations without preplanning and investments in mitigation to prevent spills caused by an earthquake. Spill response plans should consider actions that reduce risk of a spill during an earthquake and facilitate containment and cleanup, even when resources are likely to be allocated elsewhere. A major earthquake will require years of recovery in the best-case scenario and a major spill would have catastrophic implications for one of our region's greatest assets – our ecology and environment.

### Support and Contact Lists

The plan mostly addresses free floating product and ignores the dissolved fraction of oil. There is a significant amount of literature over the past couple decades on the toxicity and persistence of these chemicals and its now known that dissolved oil is much more toxic and persistent than past spill responses attributed. Additionally, there is a need to address non-floating oils (e.g., Canadian tar sands crude oil), as directed by the Legislature in E2SSB 6269, RCW 90.56.210, and WAC 173-186-603. There is considerable threat to benthic habitats and resources from non-floating oil spills.

Prompt monitoring of dissolved fractions and non-floating oils could support 1) understanding the impacts and migration, and 2) ensuring the impacts are fully characterized. King County Environmental Lab has the capacity to measure these oil chemical constituents in water. We believe our staff could support spill monitoring and should be included as contacts for Puget Sound area spills.

Finally, the contact list provided does not include local governments like King County that play a significant role in emergency management and have subject matter expertise in water quality sampling and analysis. Please see our proposed King County contact list, which includes 24-hour response line options, appended to this letter as an attachment.

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Thank you for all of your work to review, update, and improve the state's plan for oil spill response.

Sincerely,

A handwritten signature in black ink that reads "Dow Constantine". The signature is written in a cursive style with a large, prominent "D" at the beginning.

Dow Constantine  
King County Executive

Attachment: (A) King County contact list

cc: April Putney, Chief of Staff, King County Executive's Office (KCEO)  
Gina Topp, Chief Legal Counsel and Policy Advisor, KCEO  
Christie True, Director, King County Department of Natural Resources and Parks  
Brendan McCluskey, Director, King County Office of Emergency Management

**Attachment A: King County contact list**

**Oil spills on King County-maintained ROW plus after hours calls:**

King County Roads 24-hour hotline: 206-296-8100

**Oil spills on private property, and into lakes & streams and stormdrains in unincorporated King County:**

Stormwater Services Hotline: 206-477-4711 or

<https://www.kingcounty.gov/services/environment/water-and-land/stormwater/problem-investigation-line/report-form.aspx>

**All spills:**

Janice Rahman  
Operations Senior Manager  
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206-205-4061

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206-205-4069

Derrick Hiebert  
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Josh Baldi  
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