

Grant Bailey

Ecology's proposed maximum spill penalty recovery of \$300 million is insufficient to cover the costs of a major spill in Puget Sound of the Salish Sea. My career in environmental assessment and risk assessment has included spill risk and assessment of the Northern Tier Pipeline, the Trans Mountain Cross Cascades pipeline, Gas pipelines for industry and cogeneration, and years of work supporting Ecology, the Washington State Energy Facility Siter Evaluation Council, Nuclear Waste Advisory Council, and the licensing and review of biofuels facilities, pipelines, transshipment facilities and others. The \$300 million proposed by Ecology will only cover the first 90 days of a major spill effort. After that, not even shorelines will be remedied, let alone industry costs to marine fisheries, Tribal losses, property value losses, income losses, monitoring costs; long term effect costs and others. For context, the Deepwater Horizon spill damages are currently at \$65 BILLION. That is MORE THAN 200 TIMES the amount you propose! The Deepwater Horizon Spill was 40 miles offshore with remote shorelines. There is not one single location in the Salish Sea that is as far as 40 miles from shore and Puget Sound's shorelines are urban and developed. Someone at Ecology or the Governor's office needs to accept the new paradigm here and open their eyes to the fact that any liability requirement needs to be in the 10's of \$Billions - not the \$300 million proposed by Ecology. If that were the limit and had to be paid, major oil companies wouldn't even notice a dip in quarterly profits. This requirement is a good idea. As long as you are going to all this effort, propose a number that will make a difference.