

# SANCTUARY ADVISORY COUNCIL



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*Northwest Straits Commission*

*Artwork: David Sones*

July 20, 2006

Paul O'Brien  
Washington State Dept. of Ecology  
Spills Prevention Section Manager  
P.O. Box 47600  
Olympia, WA 98504

Dear Mr. O'Brien:

The Olympic Coast National Marine Sanctuary Advisory Council (AC) recognizes the importance of the oil spill contingency plan rule, and thanks you for the opportunity to comment on the draft rule. We limit our comments to the Sanctuary and immediately surrounding waters, and to the resources contained therein. Our comments reflect our concern for the resources of the Sanctuary.

The Sanctuary's location at the entrance to the Strait of Juan de Fuca exposes it to risks associated with ships transiting through very rough waters. Consequently, we favor levels of protection within the Sanctuary that are commensurate with these risks. In this regard, we note that the draft contingency plan rule contains improvements in equipment staging and response times, and we support these improvements.

We would like to offer the following specific comments for consideration in the final rule-making process:

1. The AC supports the use of Neah Bay and Gray's Harbor as regional staging areas for spill response equipment that could be used to protect Sanctuary resources in the event of a spill.

**OLYMPIC COAST NATIONAL MARINE SANCTUARY**  
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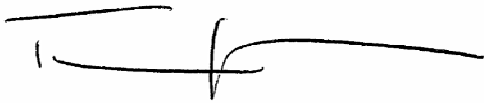
2. The AC supports the proposed requirements for the staging of spill response equipment that is appropriate for deployment within the Sanctuary. This could include equipment appropriate for deployment in rough open-ocean conditions and in sensitive shoreline areas within the Sanctuary.

3. The AC supports the proposed planning standards for all sensitive areas within the Sanctuary that lie within Washington state waters.

The advisory council is an advisory body. The opinions and findings of this publication do not necessarily reflect the position of the Olympic Coast National Marine Sanctuary and the National Oceanic and Atmospheric Administration.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terrie Klinger', with a horizontal line extending to the right.

Terrie Klinger  
Chair, Olympic Coast National Marine Sanctuary Advisory Council